



# Izembek

## National Wildlife Refuge Land Exchange/Road Corridor

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*Final Environmental Impact Statement*

### Appendix G Comment Analysis and Response Report





## **U.S. Fish and Wildlife Service Mission Statement**

*The Mission of the U.S. Fish & Wildlife Service is working with others to conserve, protect and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people.*



## **Refuge System Mission Statement**

*The Mission of the National Wildlife Refuge System is to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.*

*—National Wildlife Refuge System Improvement Act of 1997*

**APPENDIX G**  
**Comment Analysis and Response Report**

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## 1.0 INTRODUCTION

The Service prepared a Draft Environmental Impact Statement (EIS) that analyzed the impacts of a proposed land exchange with the State of Alaska and the King Cove Corporation for the purpose of construction and operation of a single lane gravel road between the communities of King Cove and Cold Bay, Alaska.

This Comment Analysis Report provides an analytical summary of the 71,960 submissions providing comments on the Draft EIS. The background of the EIS is provided in Section 1.1, while Section 1.2 describes the opportunities for public comment on the Draft EIS. Section 1.3 presents the methodology used by the Service in reviewing, sorting, and synthesizing substantive comments within each submission into common themes. Since NEPA requires all substantive comments be considered and addressed in the Final EIS, a careful and deliberate approach has been undertaken to ensure all substantive public comments were captured from the large volume of submissions. Section 2.0 describes the summary statements, referred to as Statements of Concern, which synthesize the key issues from similar individual comments. A comment index is provided in Appendix G-1, linking commenters to the applicable Statements of Concern. Appendix G-2 shows the text of the form letters received, and the applicable Statements of Concern for each. For form letters, a complete list of those who signed will be available in the Administrative Record. Appendix G-3 contains sample comment letters, including comments from the cooperating agencies.

### 1.1 Background

In the *Omnibus Public Land Management Act of 2009* (Act), Congress directed the Secretary of the Interior to prepare an EIS to conduct an analysis of a proposed land exchange with the State of Alaska and the King Cove Corporation. In addition, the Act required an analysis of a road corridor through Izembek National Wildlife Refuge in designated wilderness between the communities of Cold Bay and King Cove, Alaska.

The project planning team includes the Service as the lead agency, the Corps, Federal Highway Administration/Western Federal Lands Division, State of Alaska, Aleutians East Borough, City of King Cove, King Cove Corporation, the Agdaagux Tribe of King Cove, and the Native Village of Belkofski as formal cooperators. The EPA and Alaska Migratory Bird Co-Management Council also are working with the planning team, though not as formal cooperators. The Service conducted public involvement and scoping in 2010 and developed and analyzed alternatives in 2010 and 2011.

### 1.2 The Role of Public Comment

During the public comment period, public meetings were held to inform and to solicit comments from the public on the Draft EIS. The format for the public meetings consisted of an open house, followed by an opportunity for comments. During the open house, representatives from the Service, the cooperating agencies, and third-party EIS team were available to discuss the project and answer questions. The public meetings were documented by a court reporter. Transcripts of each public meeting are available on the project website (<http://izembek.fws.gov/EIS.htm>). The five public meetings that were held are described in Table 1.

**Table 1. Public Meetings, Communities and Dates**

Meeting	Date	Location
Anchorage	May 3, 2012	Campbell Creek Science Center Anchorage, AK
Sand Point	May 7, 2012	Sand Point Council Chambers Sand Point, AK
Cold Bay	May 8, 2012	Community Center, Cold Bay
Nelson Lagoon and False Pass	May 9, 2012	Held via teleconference with local residents present at Nelson Lagoon Community Center and the Larsen Center at False Pass
King Cove	May 10, 2012	Multi-Purpose Center King Cove, AK

These meetings were attended by a variety of stakeholders, including federal agencies, Tribal governments, state agencies, local governments, Alaska Native organizations, businesses, non-governmental organizations, and individuals.

The Service and the cooperating agencies have reviewed the comments to determine how the comments should be addressed and to make appropriate revisions in preparing the Final EIS. The Final EIS will contain a summary of comments and responses.

The Final EIS will include public notice of document availability, the distribution of the document, and a 30-day comment/waiting period on the final document. The EIS process is expected to conclude in the fall/winter of 2012. The recommended alternative will be identified in the Record of Decision, as well as the agency's rationale for the conclusions regarding the environmental effects and appropriate mitigation measures for the proposed project.

### **1.3 Analysis of Public Comment**

This section provides an overview of the methods employed in reviewing, analyzing, and developing responses to the comments that were received during the public comment period.

Comments were received on the Draft EIS in several forms:

- Oral discussion or testimony from the transcripts of the five public meetings;
- Written comments received by mail or fax; and
- Written comments submitted electronically by email or through the project website.

The Service received a total of 71,960 submissions on the Draft EIS of which 1,849 were considered unique. There were 70,111 submissions received that were considered form letters from groups including the Alaska Wilderness League (10,670 letters), Defenders of Wildlife (57,747 letters), the National Wildlife Refuge Association (347 letters) and the Sierra Club (1,346 letters), and approximately 200 signatures were submitted on a petition in support of the proposed road (1 petition). Group affiliations of those that submitted comments include: federal

agencies, Tribal governments, state agencies, local governments, Alaska Native organizations, businesses, special interest groups/non-governmental organizations, and individuals. The complete text of public comments are included in the Administrative Record for the EIS.

In the first phase, referred to as *Comment Coding*, all submissions on the Draft EIS were read, reviewed, and logged into the Comment Analysis System database where each was assigned an automatic tracking number (Submission ID). Within each submission, each distinct topic was identified, and the associated sentence or paragraph was selected to express each particular substantive comment (herein referred to as ‘comments’). A submission could contain a single comment, but many submissions include a number of distinct comments. These comments were recorded into the database and given a unique Comment ID number (linked to the Submission ID) for tracking and synthesis. The goal of this process was to ensure that each sentence and paragraph in a submission containing a substantive comment pertinent to the Draft EIS was entered into the Comment Analysis System database. Substantive comments included assertions, suggested actions, data, background information, or clarifications relating to the content of the Draft EIS.

The comment coding phase generated 7,221 substantive comments, and these were assigned subject issue categories to describe the content of the comment (see Table 2). The issues were grouped by general topics, including the regulatory framework, the proposed action and alternatives, the purpose and need, the affected environment, and the analysis of environmental consequences. The relative distribution of comments by issue is shown in Figure 1.

A total of 32 issue categories were developed for coding as shown in Table 2. These categories evolved from common themes found throughout the submissions. Some categories correspond directly to sections of the EIS, while others focus on procedural or methodological topics. Several submissions included attachments of additional independent analysis or requested specific edits to the EIS text. The relative distribution of comments by issue categories is shown in Figure 1.

In the second phase, referred to as the development of *Statements of Concern*, the public comments were then grouped into common themes. For each distinctive theme, a Statement of Concern was drafted as a summary to capture the common theme identified in the group of similar substantive comments. Statements of Concern are frequently supported by additional text to further explain the concern, or alternatively to capture the specific comment variations within that grouping. Statements of Concern are not intended to replace actual comments. Rather, they summarize for the reader the range of comments on a specific topic.

Every substantive comment was assigned to a Statement of Concern; a total of 369 Statements of Concern were developed. Each Statement of Concern is represented by an issue category code followed by a number. As with the underlying comments, the Statements of Concern are classified in the issue categories displayed in Table 2. When there are many comments within an issue category, there may be many Statements of Concern. The complete list of Statements of Concern can be found in Section 2.0.

In a third phase, termed *Responses to Comments*, the Service crafted a response to each Statement of Concern, and inserted revisions in the Final EIS as appropriate. The response to a Statement Concern is considered the response to the individual comments that are associated with that summary Statement of Concern.

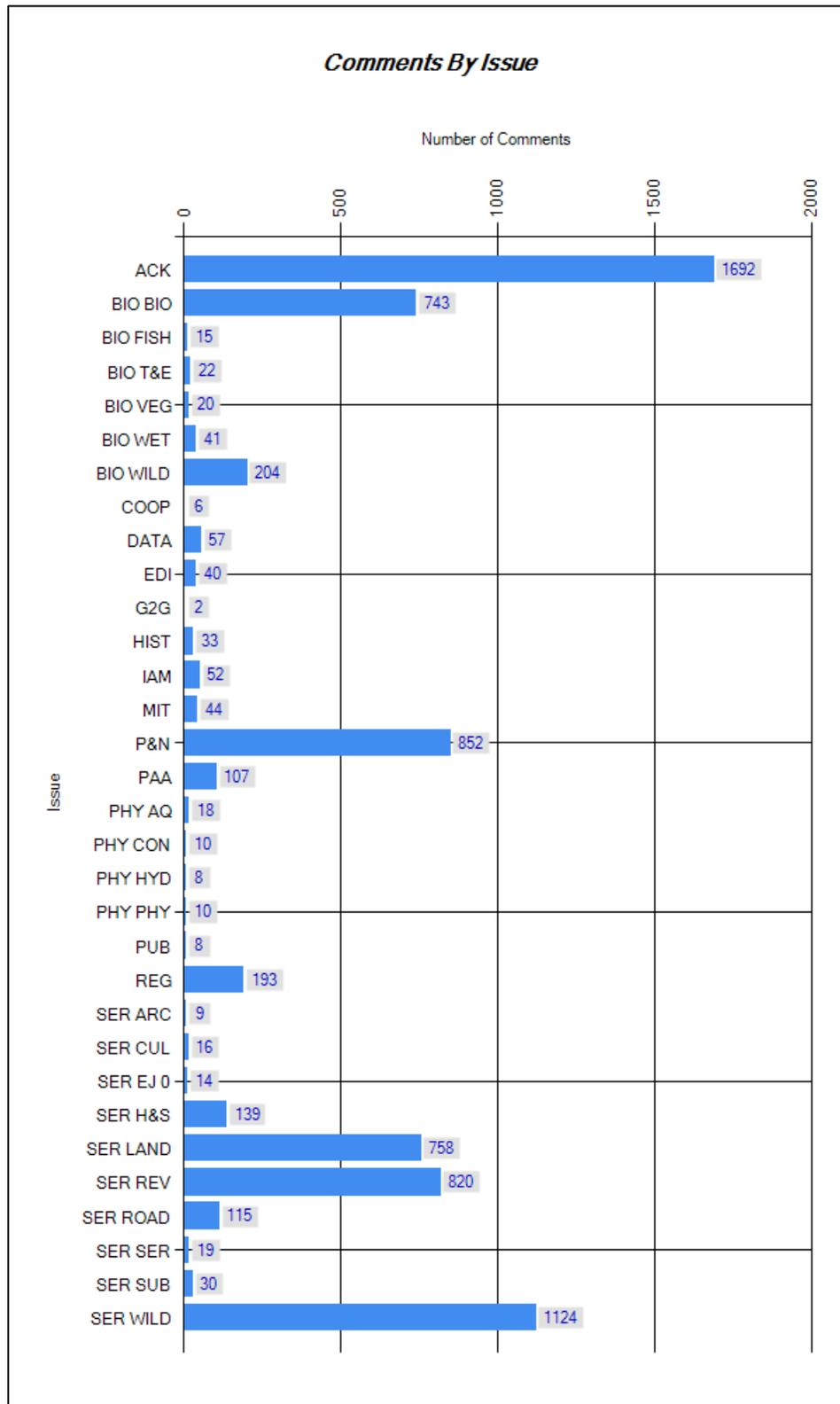
**Table 2. Issue Categories for Draft EIS Comments**

Group	Issue Category	Issue Code	Issue Summary
<b>Regulatory Compliance</b>	Federal/State Permits, Approvals, Laws, Regulations, and Policies	REG	Comments related to legislation, compliance with laws and regulations (including NEPA and Wilderness Act), and the purpose/mission of wilderness and refuge areas, and the details of the land exchange (i.e., #s of acres). Includes comments associated with the Secretary of the Interior’s decision process. Also includes comments associated with data gaps and incomplete information.
	Legislative History	HIST	History of previous legislative and administrative actions regarding a proposed King Cove Road.
	Public Involvement and Scoping Process	PUB	Comments on compliance with the NEPA process for public scoping or the public comment period.
	NEPA Impact Analysis Methods	IAM	Definitions of impact factors and impact scales. Assess impacts after mitigation considered. Comments regarding the weighing and balancing of factors to reach summary impact judgments.
	Government to Government Consultation	G2G	Comments on consultation with Tribal governments.
	Cooperating Agencies	COOP	Comments on adequacy of consultation with cooperating agencies.
<b>Purpose and Need</b>	Purpose and Need of the Action	P&N	Comments on the purpose and need of the project including health and safety, quality of life, and transportation systems.
<b>Proposed Action, Alternatives, and Mitigation Measures</b>	Proposed Action and Alternatives	PAA	Comments on the proposed alternatives (including “no action”) and their practicality/feasibility, as well as other alternatives to consider. Comments on Preferred Alternative, Environmentally Preferred Alternative.
	Mitigation Measures	MIT	Suggested measures to reduce the impact of the proposed action and alternatives.
<b>Affected Environment: Comments about each resource</b>	Biological Resources - General	BIO	General comments regarding impacts of the road on fish, wildlife, waterfowl, and their habitat. Comment is more general to the ecology or habitat of the area.
	Biological Resources - Fish	BIO FISH	Comments about the impacts to Essential Fish Habitat and salmonids.
	Biological Resources - Threatened & Endangered Species	BIO T&E	Comments about the impacts to threatened and endangered species in the project area.
<b>Environmental Consequences: Potential direct,</b>			

Group	Issue Category	Issue Code	Issue Summary
<b>indirect and cumulative impacts.</b>	Biological Resources - Vegetation	BIO VEG	Comments regarding impacts to vegetation in the project area.
	Biological Resources - Wetlands & Aquatic Communities	BIO WET	Comments regarding the impacts to wetland habitat and aquatic species (invertebrates) in the project area, including shoreline habitat.
	Biological Resources - Wildlife	BIO WILD	Comments about impacts from road construction and operation to terrestrial and marine wildlife (including waterfowl and marine mammals).
	Physical Resources	PHY	General comments on the impacts of the physical road construction, including cumulative impacts associated with other development around the refuge.
	Physical Resources - Climate & Air Quality	PHY AQ	Comments related to air quality impacts (criteria pollutants) and emission of greenhouse gases; comments related to climate change impacts.
	Physical Resources - Environmental Contaminants & Ecological Risk Assessment	PHY CON	Comments related to the possible accidental release of hazardous materials, existing site contamination, or the need for an ecological risk assessment.
	Physical Resources - Hydrology	PHY HYD	Comments about potential hydrological changes from the proposed road construction or operation.
	Socioeconomic Resources	SER	General comments on socioeconomic resources and analysis.
	Socioeconomic Resources - Archeological/Cultural Resources	SER ARC	Comments related to impacts to historic properties and cultural resources (impacts to physical objects).
	Socioeconomic Resources - Cultural Values	SER CUL	Comments on how the road may bring cultural changes or that traditional knowledge should be used as part of the analysis.
	Socioeconomic Resources - Environmental Justice	SER EJ	Comments related to the environmental justice analysis or data used for the analysis.
	Socioeconomic Resources - Health and Safety	SER H&S	Comments related to how the alternatives <u>affect</u> health and safety (changes to components of health and safety), including perspectives that the current (no action) options are hindering medical care; comments relating to more driving-related injuries and human health impacts.
	Socioeconomic Resources - Land Use, Public Use, Recreation, Visual Resources	SER LAND	Comments on the potential changes to land use, recreation (e.g., all-terrain vehicle use) or visual resources in the project area. Comments related to the quality or equity of lands proposed for exchange (e.g., high quality habitat, or disproportionate value for exchange parcels).

Group	Issue Category	Issue Code	Issue Summary
	Socioeconomic Resources - Public Revenue and Fiscal Considerations	SER REV	Comments related to the use of public/taxpayer money for the project, the funding source for implementation of alternatives including road construction and operation, as well as the overall impacts to the region's economy. Analysis of costs of the alternatives.
	Socioeconomic Resources - Road Design, Bridges, Transportation, Planning and Transportation Systems (air, water and road)	SER ROAD	Comments on the details of the road design and its connection to other roads; comments related to road maintenance and plowing; comments related to impacts to historic area roads; comments related to other types of transportation systems.
	Socioeconomic Resources - Subsistence	SER SUB	Comments on impacts to natural resources and subsistence activities.
	Socioeconomic Resources - Wilderness	SER WILD	Comments on changes to <u>wilderness values</u> (i.e., changes in solitude, wilderness fragmentation, wilderness character, etc.) related to the conveyance of the selection or construction of the proposed road.
<b>General</b>	Data and Available Information	DATA	Recommended studies and reports for the Service to review for inclusion in the EIS.
	Comment Acknowledged	ACK	Submissions without substantive comments and/or duplicate submissions.
	Editorial	EDI	Comments associated with specific text edits to the document (i.e., grammar, punctuation, consistency in usage).

**Figure 1: Comments by Issue**



## **2.0 STATEMENTS OF CONCERN**

This section presents the Statements of Concern developed to help summarize comments received on the Draft EIS. To assist in finding which Statements of Concern were contained in each submission, a Submission and Comment Index (Appendix G-1) was created. The index is a list of all submissions received, presented alphabetically by the last name of the commenter, as well as the Submission ID associated with the submission, and which Statements of Concern responds to their specific comments. To identify the specific issues that are contained in an individual submission:

- 1) search for the submission of interest in Appendix G-1;
- 2) note which Statement of Concern codes are listed under the submissions;
- 3) locate the Statement of Concern within Section 2.0; and
- 4) 4) read the text next to that Statement of Concern.

Each substantive comment contained in a submission was assigned to one Statement of Concern. Appendix G-2 contains a summary of the Statements of Concern for all form letters received.

## Biological Resources – General (BIO)

SOC Code	Statement of Concern (SOC)	Response
BIO	General comments regarding impacts of the road on fish, wildlife, waterfowl and their habitat. General comments on the ecology or habitat of the area.	Category Code; no response required.
BIO BIO 01	A road through the Izembek National Wildlife Refuge would require extensive development, construction, and maintenance, forever altering this fragile ecosystem. The proposed land exchange and destructive road would devastate this unspoiled place. It would blaze an expensive and unnecessary road right through the heart of Izembek, disturbing the fragile habitat and internationally significant species of wildlife (including Pacific Brant and Emperor Goose) that use the area.	The effects of road construction on habitats and internationally significant species of wildlife have been analyzed in Chapter 4 for vegetation, wetlands, and several individual specific species and/or species groups. Some changes have been made in Chapter 4.2 based upon other more specific Statements of Concern, such as: BIO WILD 01, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 29, BIO VEG 03, BIO VEG 05, BIO T&E 05, BIO WET 07, and BIO WET 10.
BIO BIO 02	The narrow wetland isthmus between Izembek Lagoon and Kinzarof Lagoon is a constricted area and a road there could constrain or impede navigation, migration patterns, and gene flow for wildlife and their prey sources from Izembek and the southern Alaska Peninsula onto Unimak Island and its Wilderness Area, which is also managed by the Service through the Izembek National Wildlife Refuge. The construction of a road from King Cove to Cold Bay would create and become a barrier that fragments natural processes and would have biological ramifications that the Service failed to address in the Draft EIS.	The effects of road construction on navigation and migration patterns and habitat fragmentation have been analyzed in Chapter 4 of the EIS. Changes have been made to Chapter 4, to discuss the potential effects on wildlife genetics, in Section 4.3.2.

SOC Code	Statement of Concern (SOC)	Response
BIO BIO 03	The Service failed to adequately analyze the biological effects resulting from the proposed land exchange and road corridor.	The Service disagrees; the Service did conduct an adequate analysis of the effects on species that would be most impacted by the proposed action. Potential biological effects of the land exchanges have been analyzed in Sections 4.3.2 and 4.4.2. Some changes have been made in Chapter 4 in response to other more specific Statements of Concern found within the BIO WILD, BIO WET, BIO VEG, and BIO T&E categories.
BIO BIO 04	Using 201 acres of federal government land to construct a one lane gravel road would not massively disrupt the ecosystem in the area as 6,000 acres will gain further protection.	<p>The analysis already discusses the additional protections that would be provided to the Kinzarof parcel as a result of the proposed land exchange (see Section 4.3.3.1). Exchanged lands represent little gain to the Service as (1) lands are more or less protected now as there is little threat to development due to remoteness and/or oil/gas or other extractable resource, and (2) lands lost and lands gained have little in common with regard to cover types, wildlife potential, or ecological process/function – they are not directly comparable; therefore, not comparably replaceable. Lands that would be removed from Izembek National Wildlife Refuge are lowland types of documented importance to multiple waterfowl and wildlife species, while lands that would be added to the refuge system are generally upland habitat types of lesser value to the refuge system. There are no reasonably foreseeable future actions that would reduce the habitat values of the lands proposed for addition to the refuge system.</p> <p>The potential effects that could result from the construction of a one lane gravel road are analyzed throughout Chapter 4, Sections 4.3 and 4.4. No modifications to the EIS were made in response to this statement of concern.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO BIO 05	The lands proposed for exchange are not vital habitats for significant wildlife.	<p>With the assumption that the commenter means that the State and Corporation lands proposed for exchange are not vital habitats for wildlife, as are the lands within the proposed road corridors, the following response applies: The EIS discusses the unique importance of the Izembek isthmus for caribou, Tundra Swans, Brant, and Emperor Geese. Although detailed habitat value assessments have not been made for the State and Corporation lands proposed for exchange, they are considered by the EIS authors to be somewhat less valuable due to their location in relation to the lagoons. Exchanged lands represent little gain to Service as (1) lands are more or less protected now as there is little threat to development due to remoteness and/or oil/gas or other extractable resource, and (2) lands lost and lands gained have little in common with regard to cover types, wildlife potential, or ecological process/function – they are not directly comparable; therefore, not comparably replaceable. Lands lost represent lowland types of documented importance to multiple waterfowl and game species, while lands gained are upland types with little more than reconnaissance surveys indicating unknown resource value to Service mission.</p> <p>In response to this statement of concern, modifications to the language in Chapter 4, Sections 4.3.2.2, 4.3.2.4, and 4.4.2.2, have been made to further emphasize habitat values that exist on the isthmus lands, which do not exist on the State or Corporation parcels.</p>

## Biological Resources – Fish (BIO FISH)

SOC Code	Statement of Concern (SOC)	Response
BIO FISH	Comments about the impacts to fish, Essential Fish Habitat, and salmonids.	Category Code; no response required.
BIO FISH 01	The Service should consider anadromous waters to be only those anadromous fish streams listed in the Alaska Department of Fish Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes that are designated as Essential Fish Habitat; these can include contiguous wetlands, i.e., those hydrologically connected to streams. [Draft EIS p. 3-103].	The Service disagrees. Based on the National Marine Fisheries Service's identification of Cold Bay and Izembek Lagoon as Essential Fish Habitat for 9 marine taxa and 5 Pacific salmon, as discussed in Section 3.2.3.4, the Service has identified all anadromous streams within the proposed exchange parcels as Essential Fish Habitat due to their importance as "waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity" for the 5 Pacific salmon that use Cold Bay and Izembek Lagoon. Wetlands contiguous to anadromous streams have been recognized as Essential Fish Habitat in Section 3.2.2.1 and 3.2.2.5.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>State and federal road construction regulations (particularly the Alaska Anadromous Fish Act) protect wetlands, fish streams and aquatic habitat. The Service should clarify in the EIS that the Alaska Anadromous Fish Act requires that crossings be done so as to have no negative impact on the fluvial morphology or fish abundance.</li> </ul>	<p>We agree with the comment regarding the Alaska <i>Anadromous Fish Act</i> (AS 16.05.871). Language has been added in Chapter 3 (Section 3.2.3.2) to recognize the <i>Alaska Anadromous Fish Act</i>; and the requirements of the <i>Omnibus Public Land Management Act of 2009</i> (Act) (Public Law 111-11, Title VI, Subtitle E) have been discussed in Alternative 2 and referenced within Alternative 3 in Chapter 4 to evaluate the potential for effects on fish resources.</p> <p>Sediment control during road construction and fish stream crossing features will comply with industry standards developed by the American Fisheries Society. Incremental increases in sedimentation of streams and ponds, along with degraded fish habitat, are expected due to road operation.</p>
BIO FISH 02	The Service should revise these specific areas of the EIS regarding the analysis of the effects to Essential Fish Habitat:	See response to each of the sub-components of this statement of concern.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The construction of a road in either the southern road corridor or the central road corridor will not have a measurable direct or indirect effect on Essential Fish Habitat. The addition of anadromous fish streams in the Mortensens Lagoon parcel, Kinzarof Lagoon parcel, and the State parcel will be a positive impact to the fish habitat and fish populations since these habitats will be transferred to federal ownership as part of the National Wildlife Refuge System. The addition of anadromous fish streams in the Kinzarof Lagoon parcel and the State parcel to the National Wilderness Preservation System will have a major positive effect because these streams will become "unique" Essential Fish Habitat.</li> </ul>	<p>The Service disagrees. As discussed in Section 4.3.1.4 (Hydrology), Section 4.3.2.1. (Terrestrial and Aquatic Plant Communities), Section 4.3.2.2 (Wetlands), and Section 4.3.2.3 (Fish and Essential Fish Habitat), the construction of a road would affect plant communities and hydrology which would influence stream morphology and the functions of associated wetlands. Both the anadromous streams and their contiguous wetlands are recognized as Essential Fish Habitat by the National Marine Fisheries Service. The State of Alaska has elected to retain title to the submerged lands beneath most of the streams and lakes in the two State owned parcels regardless of navigability, so the submerged lands beneath these waters would not be added to the National Wildlife Refuge System. Furthermore, the anadromous streams within the Mortensens Lagoon and Kinzarof Lagoon parcels are tidally influenced for a substantial portion of their length. The tidally influenced portions are considered navigable waters by definition, and therefore these submerged lands would also be retained by the State as inland navigable waters. No edits were made to the EIS in response to this comment.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Alternatives 1, 4, and 5 will result in a negative effect on the "unique" fish habitat on the King Cove Corporation relinquishment parcel that will be removed from the Izembek Wilderness Refuge.</li> </ul>	<p>The Service disagrees. As no planned resource development activities are identified that would occur, Alternatives 1, 4, and 5 would not necessarily have an adverse effect on Essential Fish Habitat. Furthermore, the <i>Sustainable Fisheries Act</i> and State of Alaska regulations regarding the protections of anadromous streams remain effective regardless of land ownership. No edits were made to the EIS in response to this comment.</p>
	<ul style="list-style-type: none"> <li>• Fish habitat associated with the Sitkinak Island parcels is not "unique" and will have no measureable effect on fish habitat and populations.</li> </ul>	<p>The Service agrees that the proposed land exchange would have no measurable effect on fish habitats and populations associated with the Sitkinak parcel. No changes have been made to the analysis in support of this point because the EIS does not recognize fish habitats on the Sitkinak parcel as "unique."</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The impact and benefit information and management opinions from other agencies should be presented in the EIS. An example is the statement of the "roads major impact on fisheries" based on 3 anadromous stream crossings in the eastern portion of Kinzarof Lagoon. Alaska Department of Fish and Game information indicates that these streams' salmon abundance are rather small in comparison to the land exchange area. The largest run documented for the road area is about 1,100 sockeye, while Mortensens Lagoon has a documented return of over 21,000 sockeye: an approximate 20:1 order of magnitude difference. Habitat utilization and species abundance comparisons of a similar magnitude in the exchange area would give a more realistic balance to Draft EIS evaluation. The authors of this document should reference species abundance and utilization for the "proposed transfer areas" as well as the "road impact" area.</li> </ul>	<p>Section 4.3.2.3 has been amended to identify the effects to be <i>moderate</i>. The determination of "major" in the EIS was based on the potential for overharvest due to improved access to streams with small salmon runs. The revisions made to Section 4.3.2.3 include the description of a mitigation measure that includes adjustments in the harvest regulations, public outreach, good signage, and enforcement to minimize the potential for overharvest, resulting in a moderate effect. The remaining indirect effects of concern (reduction in water quality through erosion, sedimentation, and pollution from vehicles and other anthropogenic sources) results in a moderate effect due to the stream's status as unique resources.</p> <p>A comparison of the species abundance between the two parcels is not relevant, due to the fact that both streams are protected by the <i>Sustainable Fisheries Act</i> and State of Alaska regulations regarding the protections of anadromous streams and the streams within the Mortensens Lagoon parcel would not be part of the proposed land exchange, but would be retained by the State. The average run sizes of both streams have been included in Section 3.2.3.3 under the description of anadromous streams.</p>
BIO FISH 03	The Service should revise the summary of the effects of the alternatives contained in Chapter 2 of the Draft EIS [p. 2-59]:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>Under the updated version of Alternative 1, there is no hovercraft and no resulting effect on Essential Fish Habitat (Essential Fish Habitat).</li> </ul>	The Service has revised the summary of the effects in Chapter 2 and the effects analysis in Chapter 4 for Alternative 1 to reflect that the hovercraft has been moved to Akutan.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Under Alternative 2, there is no justification for the effects designation of major since the Alaska Department of Fish and Game controls fish harvest and there is no evidence to support any substantial fish harvest pressure from a community of only 700 residents and even fewer fishing license holders. Neither is the probability estimated, given the fact that persons travelling from the City of Cold Bay would have to drive at least 20 miles to reach one of these streams of concern, while a person travelling from the City of King Cove would drive at least 25 miles. Both scenarios require an assumption that a person will drive by superior fish streams and shores of Cold Bay, which are accessible by the existing road network.</li> </ul>	<p>The Service recognizes that this "major" effects determination was based on "if overharvesting were to occur," and that action taken by the Alaska Board of Fisheries and enforcement actions to prevent overharvest would reduce this effect. The Service did not assume that residents of the communities of King Cove or Cold Bay would intentionally drive 20 to 25 miles to specifically target these streams. It is reasonable to assume that travelers passing over these streams, en route to other destinations, could stop to harvest some of these fish that would be easily seen and harvested only a few steps from the road. The effects determination has been modified to describe a mitigation measure that would include appropriate adjustments to harvest regulations, signage and enforcement. See response to BIO FISH 02 bullet 4.</p>
	<ul style="list-style-type: none"> <li>Under Alternative 5, explain why it is unlikely that a modification of the existing dock in Cold Bay would not have an effect on Essential Fish Habitat.</li> </ul>	<p>Under Alternative 5 (Section 4.6.2.3) additional statements have been added to explain why it is unlikely that a modification to the existing dock in Cold Bay would not have an effect on Essential Fish Habitat.</p>
BIO FISH 04	<p>The Service should revise these specific areas of the EIS regarding the analysis of the effects to Essential Fish Habitat discussed in Chapter 4:</p>	<p>The Service has revised Section 4.3.2.3 to change the effects determination from major to moderate. See the discussion under BIO FISH 02 bullet 4 above.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>There is insufficient information to justify the designation of "major" indirect effects to fish resources. While increased vehicular access could result in an increase in fish harvest, the consistent lack of Alaska Department of Fish and Game Statewide Harvest Survey site-specific estimates indicate that overall angler effort in the Cold Bay area has likely remained relatively low over time. Subsistence harvest is managed by state and federal regulations. However, efforts are currently focused in areas with larger fish populations. Alaska Department of Fish and Game management efforts in the area may increase if overharvest becomes a problem. Suggest modifying the paragraph as follows: "Most anticipated indirect effects, such as effects to water quality and potential increased harvest pressure, would be of low intensity, long-term duration (intermittent but persistent for the life of the project), local in extent, but would impact unique resources resulting in a negligible to minor effect." [Draft EIS Chapter 4, p. 4-129, Sec. 4.3.2.3, Paragraph 3], Draft EIS Chapter 4, p. 4-131, Sec. 4.3.2.3, Paragraph 6].</li> </ul>	<p>The Service has revised Section 4.3.2.3 to change the effects determination from major to moderate. See the discussion under BIO FISH 02 bullet 4 above.</p>
BIO FISH 05	<p>The Service should consider the potential effects to nearby streams or rivers adjacent to those that will be directly crossed by the proposed road. For example, the Joshua Green River would be a short walk from the proposed road. Increased fishing and disturbance to this river could have a major impact on fish stocks and wildlife that are dependent on the river. Therefore, the Service should revisit the determination that the effects to anadromous species habitat is not anticipated to be measurable. [Draft EIS, Executive Summary, p. 32, Section ES-Table 6: effects on fish]</p>	<p>The Service disagrees. Walking distance to the Joshua Green River from the proposed road corridors would be about 6 to 8 miles, similar to the distance from the Northeast Terminal site. As stated by another commenter, King Cove or Cold Bay community residents would be unlikely to travel that far in pursuit of fish when there are superior fishing opportunities much closer to those communities. Unauthorized all-terrain vehicle access to streams and ponds adjacent to but not within the road effect zone (see Forman et al. 1997) may cause incremental degradation and sedimentation. No changes have been made in response to this concern.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO FISH 06	The Service should revise the effects analysis regarding increased harvest pressure for the streams crossed by the southern and central road corridors to negligible to minor for the following reasons:	The concerns and the effects determination regarding increased harvest pressure have been modified. See the responses to BIO FISH 03 and 04 above.
	<ul style="list-style-type: none"> <li>• Revise to reflect that with no hovercraft in use under the updated version of Alternative 1, there will be no effect on Essential Fish Habitat [Draft EIS p. 4-26-30].</li> </ul>	Revisions have been made to Section 4.2.2.3 to describe no effects on Essential Fish Habitat.
	<ul style="list-style-type: none"> <li>• Subsistence or sport fishers coming from the City of King Cove will drive at least 25 miles, passing excellent fishing opportunities (with direct access to five anadromous streams at 17 crossings) on the shores and tributaries to King Cove Lagoon.</li> </ul>	See response to BIO FISH 03 above.
	<ul style="list-style-type: none"> <li>• Similarly, subsistence or sport fishers coming from the City of Cold Bay will drive at least 20 miles, with access to closer and better fishing opportunities.</li> </ul>	See response to BIO FISH 03 above.
	<ul style="list-style-type: none"> <li>• Finally, the Alaska Department of Fish and Game has established daily bag limits, so fishing in this region is currently being managed and there is no reason to assume that fishing pressure would be greater than for any other stream in the King Cove-Cold Bay area with road access [Draft EIS p. 4-131]. The overall effect of the land exchange and road on fish and Essential Fish Habitat should be negligible to minor.</li> </ul>	See response to BIO FISH 02 bullet 4 above.

SOC Code	Statement of Concern (SOC)	Response
BIO FISH 07	<p>The EIS should clarify that there is one little salmon stream in Kinzarof and some of the fish go up there, and there is a small run of chum salmon in Kinzarof Lagoon. The salmon that frequent Kinzarof Lagoon are so small that they generally look for a lake. Where the creeks would be intercepted by the road, it could be that this impact is addressed the same way that the issue was addressed in King Cove when they required bridges instead of culverts, and that could easily be done with this road.</p>	<p>Additional information has been added to Chapter 3 (Section 3.2.3.3) to identify the size of the fish runs in the streams draining into Kinzarof Lagoon. Habitat alteration concerns expressed in this comment are addressed by mitigation measures carried forward to this EIS from the 2003 EIS, which include culvert and bridge design and maintenance, as were required for the construction of the King Cove Access Road.</p>

## Biological Resources - Threatened & Endangered Species (BIO T&E)

SOC Code	Statement of Concern (SOC)	Response
BIO T&E	Comments about the impacts to threatened and endangered species in the project area.	Category Code; no response required.
BIO T&E 01	The Service should revise these specific areas of the EIS regarding the analysis of these threatened and endangered species:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>• Revise effects of the updated version of Alternative 1 to reflect no hovercraft effect on threatened and endangered species, including a rewrite of mitigation measures no longer needed. [Draft EIS p. 4-42-52; p. 4-63-72]</li> </ul>	Effects analyses have been revised, including mitigation measures, for all threatened and endangered species in accordance with the modified Alternative 1.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Clearly and consistently identify the net effects of both road alternatives to Emperor Goose, Brant, Steller’s Eiders, and northern sea otters by adding state ownership of 4,300 acres of water and submerged land comprising of Kinzarof Lagoon with its 2,300 acres of eelgrass habitat and 17 miles of intertidal shoreline added to the Izembek State Game Refuge.</li> </ul>	<p>A description of the net effect of adding the Kinzarof Lagoon and associated habitats to the State Game Refuge has been described in Chapter 4, as provided by the State of Alaska.</p> <p>The addition of the Kinzarof Lagoon to the Izembek State Game Refuge would provide greater protection for tidelands and submerged lands, including eelgrass beds, and marine water that provide habitat for Steller’s eiders, emperor geese and other waterbirds; harbor seals; and various species of fish. The Alaska Department of Fish and Game would use the Izembek State Game Refuge Management Plan to manage land use activities in the lagoon, including a requirement for a Special Area Permit for any activity that may damage refuge resources, disturb wildlife or disrupt existing public uses. Management of species harvest would be unaffected by the change in land status from general state land to refuge land. However, the Izembek State Game Refuge plans states that the Alaska Department of Fish and Game will work with the Department of Natural Resources to prepare mineral leasehold location orders for the Izembek State Game Refuge, and also recommend that the Department of Natural Resources not offer offshore prospecting permits or leases within the refuge. The departments will recommend that the legislature close the refuge to new locatable mineral entry, mineral prospecting, and mineral leasing under AS 38.05.185-38.05.300.</p>
	<ul style="list-style-type: none"> <li>Revisit the impacts of the road located in either the southern road corridor or the central road corridor [Alternative 2 and 3] and determine if it will have the same effect to the population of northern sea otters, e.g. negligible during construction and minor during operation and maintenance.</li> </ul>	<p>Analysis of impacts of the respective proposed road corridors on northern sea otters has been reassessed in order to determine if effects differ with the different road alignments. No edits to the analysis has been made as a result of this reassessment because the impacts remained the same.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Under Alternative 2, there is no determination of overall, summary impacts from construction activities for Steller's Eiders, Yellow-billed Loons, or Kittlitz's Murrelets; only the levels for the impact components are listed. [Draft EIS p.4-167, fourth paragraph]</li> </ul>	<p>A summary of road construction impacts on Steller's Eiders, Yellow-billed Loons, and Kittlitz's Murrelets has been added to the summary paragraph in section 4.3.2.7.</p>
	<ul style="list-style-type: none"> <li>Under Alternative 2, clarify the detection and effects of noise on Steller's Eiders, Yellow-billed Loons, and Kittlitz's Murrelets [Draft EIS p. 4-166, fourth paragraph and p. 4-167, last paragraph] during the road construction and during operation and maintenance.</li> </ul>	<p>Additional details (ABR 2010) have been added to the description of noise disturbance and noise detection in section 4.3.2.7.</p>
	<ul style="list-style-type: none"> <li>Under Alternative 2, while an increase in disturbance could have effects on Steller's Eiders, it has not been shown clearly that such increases in disturbance will occur. It would be helpful to provide some sort of quantification or qualitative categorization of the possible increase in unauthorized access and disturbance due to construction and use of the proposed road. In particular, describe the likelihood that those activities will occur and what the magnitude of those activities could be if they did occur. It is not sufficient to consider that there could be a substantial increase in those activities (and to use that possible increase to reach a conclusion of moderate overall impacts on Steller's Eiders) without some type of estimate of the level of those disturbance effects. [Draft EIS p. 4-168, third paragraph and p. 4-169, fourth paragraph]</li> </ul>	<p>One of the key factors considered in the analysis of effects regarding disturbance to Steller's Eiders is the degree to which either of the road alternatives would lead to unauthorized use of all-terrain vehicles on refuge lands and associated increases in hunting, fishing, and other activities. There is evidence that the newly constructed road to the Northeast terminal site has been used by all-terrain vehicle users to access refuge lands on the east and northeast sides of Kinzarof Lagoon, with tracks concentrated in wet or moist graminoid areas (Sowl 2008c and 2011f). There is no way to quantify where or how often incursions into refuge lands would occur under the road alternatives but the Service assumes some incursions are likely to occur in spite of any efforts to keep vehicles on the road. It is assumed such incursions by all-terrain vehicles or foot traffic would occur in areas that are attractive for hunting, fishing, berry picking, and other popular recreational activities or allow users to travel more easily to such areas than currently exist without the road. Once a track is established, additional use is more likely and areas currently undisturbed by human activities could be exposed to chronic or periodic disturbance.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Under Alternative 2, the effect to Steller's Eiders should be in the range of negligible to minor since current hunting operations are already in place. [Draft EIS p. 2-64-5]</li> </ul>	<p>The effects to Steller's Eiders from Alternative 2 are based on the anticipated increase in access to the isthmus that would result from road construction. No edits have been made as a result of this comment.</p>
	<ul style="list-style-type: none"> <li>Under Alternative 3, the central corridor will not increase access to Izembek Lagoon, since the entire shoreline will be wilderness and according to the existing transportation information in the Draft EIS, it does not show any existing vehicle access to Kinzarof Lagoon. [Draft EIS p. 2-64-5]</li> </ul>	<p>The Service disagrees. Increased access to Izembek Lagoon is likely to result from Alternative 3, from both all-terrain vehicle incursions around the barriers and from hunters and others on foot traveling from the new road to the lagoon.</p>
	<ul style="list-style-type: none"> <li>Under Alternative 3, there is a greater potential to impact the designated critical habitat for Steller's Eiders in the Izembek Lagoon complex, than there is for the other alternatives, including the no action alternative.</li> </ul>	<p>The Service agrees that there may be a somewhat greater potential for disturbance to Steller's Eider from Alternative 3 than Alternative 2. Both alternatives provide increased access to Steller's Eider critical habitat, whether by increased foot traffic or all-terrain vehicle incursions around the barriers. Therefore, both alternatives are considered to have moderate effects.</p>
	<ul style="list-style-type: none"> <li>Under Alternative 5, the effects to Steller's Eiders should be changed to negligible to match the cumulative effects section or the explanation needs to be clarified since Steller's Eiders are not present during Cold Bay dock construction, but the Draft EIS states they could be disturbed by road construction during the same seasonal period. [Draft EIS p. 2-64-5]</li> </ul>	<p>The requested changes were for section 4.6.2.7 (Alternative 5); text was modified for clarification, but effects retained as negligible to minor. If construction continues until November, there could be overlap with eiders returning to the area in the fall. Even if the direct or indirect effects are negligible to minor, cumulative effects could still be negligible as it is in reference to the overall contribution of the activity to cumulative effects.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The Draft EIS fails to analyze the cumulative impacts on Steller's Eiders of the action alternatives in the context of climate change. There is no mention of climate change impact in the environmental effects section, despite the vulnerability of this species to climate change impacts. The Service must take these cumulative impacts into account when deciding among the proposed alternatives.</li> </ul>	<p>Revisions to Sections 4.3.2.7 and 4.4.2.7 have been made to identify the concern related to climate change.</p>
	<ul style="list-style-type: none"> <li>The Draft EIS should note that the loss of the sea ice in the northern Bering Sea is reducing the abundance of the Steller's Eider bottom dwelling invertebrate prey. As competitors, such as fish and crabs, move northward with warming ocean temperatures, they invade the eider's foraging grounds and consume its food sources. Acidifying waters are making it more difficult for clams and snails to build their calcium carbonate shells, limiting abundance of these species and further reducing availability of the eider's food sources. The disappearance of sea ice may deprive eiders of dry places to rest, causing them to burn more energy.</li> </ul>	<p>Although this concern is stated in Chapter 3, Section 3.2.7.1, revisions have been made to more fully describe this concern.</p>
	<ul style="list-style-type: none"> <li>Climate change also threatens the eider's nesting grounds on the coastal tundra of Alaska and Siberia. Eiders nest in the tundra wetlands near shallow ponds and lakes that provide plentiful insect and plant food. However, rising temperatures are melting the permafrost, which threatens to dry up the eider's nesting grounds and transform the tundra into shrub lands and forests.</li> </ul>	<p>Revisions have been made in Section 3.2.7.1 to describe this concern about habitat loss.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Steller's Eiders are sensitive to human disturbance. The direct effects of unreported subsistence take and indirect disturbances from a road, as proposed in Alternatives 2 and 3, would increase mortality, place further energetic demands on the eiders, or displace them from preferred foraging habitat. This could force Steller's Eiders at Izembek into a negative energy state. Because nearly half of the Alaska population uses Izembek as a molting ground, population-level effects on the Steller's eider due to the cumulative impacts of Alternatives 2 or 3 and climate change could be significant. Road construction and use along with climate change would have significant long-term synergistic impacts on the future viability of this threatened species.</li> </ul>	<p>Revisions have been made to Sections 4.3.2.7 and 4.4.2.7 to incorporate the concern related to the effects of climate change as a cumulative effect on Steller's Eiders.</p>
BIO T&E 02	<p>Revise the effects discussion of Kittlitz's Murrelet or provide documentation in the Final EIS that validates the claim of negative effects to airborne Kittlitz's Murrelets from flying over the proposed road. This should be done in sufficient detail so that the Record of Decision clearly identifies whether an additional consultation under Section 7 or Biological Assessment or Biological Opinion is required for the Kittlitz's Murrelet.</p>	<p>As a candidate species for listing under the Endangered Species Act, Kittlitz's Murrelets are not currently afforded protection as a threatened or endangered species. By October 2013, the Service must either propose that the Kittlitz's Murrelet be listed or determine that it does not need the protections of the ESA. That final determination will dictate required responses to potential adverse effects from the proposed actions. The infrequency of observations and likely low numbers of Kittlitz's Murrelets in the area suggest that, although a bird (or birds) flying over the road corridor could be disturbed during the transit through the area, the frequency and duration of disturbance would be minimal. Text in sections 4.3.2.7 and 4.4.2.7 has been changed to reflect that. The direct and indirect impact during the construction phase was considered negligible.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO T&E 03	This road will have a devastating effect on the natural balance of this pristine area, in effect destroying the network which supports existing plant and animal life, much of it consisting of protected species.	The Service conducted a thorough assessment of the effects of the two road alternatives (Alternative 2 and Alternative 3) on threatened and endangered species following standard NEPA protocol. Potential impacts are species-specific and range from no effects (Steller sea lions), minor effects (Yellow-billed Loon, Kittlitz's Murrelet, and sea otters), to moderate effects (Steller's Eiders).
BIO T&E 04	There is potential for Kittlitz's Murrelet nesting habitat on the higher elevations of the King Cove Corporation relinquished selection parcel. Under Alternatives 2 and 3, this potential nesting habitat will remain a part of the Izembek Wilderness. Under Alternatives 1, 4, and 5, this potential habitat will be transferred to the private ownership of the King Cove Corporation. The effect of retaining or eliminating this parcel in wilderness is uncertain.	The habitat on the proposed King Cove Corporation lands proposed for exchange do not have suitable habitat for Kittlitz's Murrelets. See Chapter 3, Affected Environment for habitat description. These lands are not under threat of development. Therefore, there would be no effect on these birds. The King Cove Corporation would need to consult with the Service if they had plans for developing the area and if Kittlitz's Murrelets are listed under the Endangered Species Act.
BIO T&E 05	The entirety of the Izembek Lagoon complex - waters, eelgrass beds, and intertidal shorelines are in state ownership and managed as part of the Izembek State Game Refuge. Within the exterior boundaries of the designated Critical Habitat for the Izembek Lagoon complex are two areas identified as high density molting habitat. There are no designated Critical Habitats or high density molting habitat for Steller's Eiders on Kinzarof Lagoon. Both the Izembek Lagoon complex and the Kinzarof Lagoon are considered to provide high density use wintering habitat for Steller's Eiders.	This concern is adequately addressed in section 3.2.7.1 and illustrated in figure 3.2-25. No edits have been made in response to this comment.

## Biological Resources – Vegetation (BIO VEG)

SOC Code	Statement of Concern (SOC)	Response
BIO VEG	Comments regarding impacts to vegetation in the project area.	Category Code; no response required.
BIO VEG 01	The road and subsequent vehicle traffic will introduce invasive species into the Izembek National Wildlife Refuge; therefore, the applicant should be responsible for developing an invasive species plan that must meet the approval of the Service and the US Army Corps of Engineers. [Draft EIS p. F-8]	The Service agrees. The Invasive Species Management Plan identified in Appendix F has been changed to identify the applicant as the responsible party for development of the plan. Approval of the plan would be the responsibility of the Service and the Corps.
BIO VEG 02	The Draft EIS states that there would be an indirect effect from operation and maintenance on plant communities resulting from dust, but this is not supported by the analysis. Unless the Service can document impacts to the Outer Marker Road or Outpost Road as a result of vehicular dust, the effects on plant communities from dust should be negligible, not moderate, since the area receives significant rainfall. The use of data from the Denali Highway in the analysis is inappropriate. [Draft EIS p. 4-125]	The data presented in the analysis is from the Denali Park Road, not the Denali Highway. However, we understand the commenter's point. The Service does not agree that the additional rainfall that occurs in the Izembek area would preclude impacts to vegetation caused by road dust. Common persistent winds in the Izembek area quickly dry out road surfaces resulting in dust plumes generated by passing vehicles. Absence of dust studies along Outer Marker Road does not negate the concerns that effects on vegetation near the road would be moderate. No edits were made in response to this comment.

SOC Code	Statement of Concern (SOC)	Response
BIO VEG 03	Several aspects of the effects to rare vegetation should be re-analyzed. The Service should revisit the conclusion that alternatives 2 and 3 would not change the justification for the Ramsar designation because this conclusion is not supported by the scientific information provided in the Draft EIS. Due to a lack of rare plant surveys, it cannot be determined if the ecological character of the Ramsar Site would be changed as a result of impacts due to the proposed road. A change in character can be determined through the use of an effective monitoring and survey program using the Ramsar criteria; this monitoring is needed before the Final EIS and Record of Decision are completed. Rare plant surveys could document the presence of rare plant populations within a road alignment, but with no commitment to protect rare plant populations in the Draft EIS, they could still be eliminated by construction resulting in a major level of impact on this resource. The impact level should be major since impacts are generally medium or high intensity, long term or permanent in duration, of regional or extended scope, and affect important or unique resources. [Draft EIS p. 3-42-43]	Revisions have been made to Chapter 3 Section 3.2.2 and Chapter 4 Sections 4.3.2.2 and 4.4.2.2 to more clearly describe the area designated as a Ramsar wetland and the criteria that were met, which supported the designation. The criteria documented in the reports about the Izembek Ramsar designation do not include the presence of rare plants. Therefore, although the need for rare plant surveys prior to construction are identified within the listed mitigation measures, the need for rare plant surveys cannot be linked to the Ramsar designation.
BIO VEG 04	The Service needs to revise the analysis regarding the effects of the land exchange to the vegetation; the effects are negligible, not moderate. While the chart [Draft EIS p.2-57] notes that 52,583 acres of new native plant cover is added to the refuge system, it also needs to consider that substantial vegetation will become wilderness, precluding most development such as oil and gas leasing on the 41,887 acres of state land with unique habitats for Tundra Swans and caribou.	The Service disagrees. The EIS recognizes that over 52,000 acres would be added to the refuge system (Chapters 2 and 3). However, the analysis of effects on vegetation relates to the effects of road construction within the proposed corridors.

SOC Code	Statement of Concern (SOC)	Response
BIO VEG 05	The EIS should consider effects to water quality and the potential to degrade the eel grass beds found in the Izembek Lagoon.	The Service agrees. Language in Section 4.3.1.4 has been modified to recognize potential indirect effects to the eelgrass beds that could result from turbidity and contaminants released during construction and operation and maintenance. However mitigation measures would alleviate estimated indirect effects.
BIO VEG 06	The eel grass is growing very well. This winter, all the lagoons froze deeply and when they thawed out, the eel grass was up one to two weeks later - all green, brand-new, ready to go for the summer. So there is no trouble with eel grass in Izembek.	The Service agrees that eelgrass populations are healthy. No edits were made in response to this comment.

## Biological Resources - Wetlands & Aquatic Communities (BIO WET)

SOC Code	Statement of Concern (SOC)	Response
BIO WET	Comments regarding the impacts to wetland habitat and aquatic species (invertebrates) in the project area, including shoreline habitat.	Category Code; no response required.
BIO WET 01	The construction of the proposed road would destroy the fragile wetland habitat, which is of global ecological significance.	The analysis identifies the wetlands that would be lost under Alternatives 2 and 3 in Chapters 2 and 4. The values of those wetlands are described in Chapter 3. Chapter 4 (Section 4.3.2.2) discusses the effects on the Ramsar designated wetlands.
BIO WET 02	Revise the analysis of impacts of the road on hydrology and wetlands to consider effects beyond the 400 foot corridor on vegetation classes that are an integral function of the wetland complex on the isthmus. [Section 4.2.1.4] [Draft EIS p 4-18, 19].	The referenced section and page numbers pertain to Alternative 1 and do not correspond to the 400-foot corridor issue. The purpose of the 400-foot wide corridor used in the analysis of Alternatives 2 and 3 was for comparative purposes. The 400-foot corridors encompass representative hydrology and vegetation that could be affected by each potential road. The effects determinations in Chapter 4 were made with consideration of the total hydrologic effects of each alternative. No edits to the EIS have been made in response to this comment.
BIO WET 03	[Draft EIS p. 4-122 Section 4.3.2.2] This section is difficult to understand and confusing. Numeric information, particularly as presented in the second sentence of paragraph two, would be easier to follow by having it in a table. This section should be rewritten for clarity in the Final EIS.	The Service agrees. A table has been added to display these wetland exchange acres.

SOC Code	Statement of Concern (SOC)	Response
BIO WET 04	If off-road vehicle or snow-machine use occurs off the road, there is potential for further disruption of hydrologic processes in this wetland complex.	The Service agrees. The language in Section 4.3.2.2 (Direct Effects and Indirect Effects from Operation and Maintenance) has been modified to recognize the potential disruption of hydrologic process within the wetland complex that could occur if all-terrain vehicle use occurs.
BIO WET 05	As presented, the data do not warrant a rating of moderate impact for the loss of 3.8 acres of wetland due to construction. Reconsider the ratings to provide more complete justification for the finding of moderate impact, or reduce the ratings to minor or negligible. [Draft EIS p. 4-122 - 4-124]	The Service disagrees. The finding of moderate effect is based not only upon the loss of 3.8 acres of important wetlands but also on the modifications that will occur to the hydrology of adjacent wetlands because road fill. This road fill would disrupt subsurface flows causing some ponding upslope and some dewatering downslope, and rerouting of surface waters through 154 cross drainage culverts resulting in a change of wetland functional capacity.
BIO WET 06	The Service should review these suggested edits for clarification of statements in the wetlands section of the EIS:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>• A figure illustrating the watershed boundary between Izembek and Kinzarof lagoons would assist in evaluating direct and indirect effects to the watersheds [Draft EIS Chapter 3].</li> </ul>	Figure 3.1-3 illustrates the watershed boundary between Izembek and Kinzarof lagoons.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Giving the wetlands totals at 0.1 acre implies a level of accuracy that cannot be achieved with the data used for the analysis. Suggest that the wetlands acreages be rounded off no less than to the nearest acre unless the wetlands data is verified in the field [Draft EIS Chapter 3 Table 3.2-6].</li> </ul>	<p>The Service disagrees. Wetland boundaries mapped and displayed on Figure 3.2-7 and 3.2-8 were relatively easy to distinguish through the use of aerial photography from 1987, 1995 and 2009, representing different stages of the growing season. The photos displayed fairly distinct vegetative signatures along stream channels and the boundaries of pothole lakes and other depressional wetlands. Although this wetland mapping effort did not include ground-truthing (which would be completed by the applicant prior to permit application), these wetland delineations are considered to be sufficient for analysis. No edits have been made in response to this comment.</p>
	<ul style="list-style-type: none"> <li>• Clarify the boundary of Wetlands of International Importance - The Ramsar boundary needs to be clearly delineated and described. The Service should resolve the boundary discrepancy so it can be accurately described in the Final EIS [Draft EIS Chapter 3-47, Section 3.2.2.2]. Draft EIS Figure 3.2-2 adds to the confusion since it shows the boundary submitted with the original application not the official boundary as it is described in the text. Suggest Figure 3.2-2 be modified to show the Ramsar area using the Izembek State Game Refuge boundary. Suggested wording: The Izembek National Wildlife Refuge, including the Izembek State Game Refuge as shown in Figure 3.2-2, is one of 19 sites in the U.S. designated as Wetlands of International Importance under a multi-national environmental agreement known as the Ramsar Convention (Ramsar) [Draft EIS Chapter 3-48 last paragraph].</li> </ul>	<p>The Service agrees. The figure in Chapter 3 displaying the proposed Ramsar area has been replaced by a figure that displays the approved Ramsar area, and supporting language has been incorporated.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The EIS states in this section that there would be a beneficial effect to wetlands as a result of the land exchange. Although wetlands managed as wilderness would receive more legal protection than wetlands managed by the state of Alaska, in reality, the wetlands proposed for exchange from the state are under no threat of development, occur within a very similar remote area far removed from human induced impacts and for all practical purposes function as wild areas much as officially designated wilderness areas do. The Corps does not believe the land exchange would result in a benefit to wetlands. While lands may change ownership and management plans change, there is no gain to the amount of wetlands, no significant added protections to existing wetlands that are currently under any threat, nor is there any threat to these wetlands in the foreseeable future. Furthermore, as the EIS states, the wetlands that would be impacted by a road are of a much higher value than state lands offered in the exchange. From the Corps perspective, there is little to no benefit to wetlands that would result from the proposed land exchange. Furthermore, the purpose of the land exchange is for a road which would have negative effects on wetlands. The EIS is misleading in telling the public that there would be a benefit to wetlands. Either remove the statements about the land exchange being a benefit to wetlands, or clarify that the Corps believes the land exchange would not result in a real benefit to wetlands [Draft EIS Chapter 4 Page 4-125 Section 4.3.2.2 Paragraph 13, Summary].</li> </ul>	<p>The Service agrees. The referenced statement in Section 4.3.2.2 (and for Alternative 3) has been modified by removing the language about the land exchange being a benefit to wetlands, and replacing it with language that is consistent with the Corps' comments.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The use of the words "net gain" may be true in the sense that the refuge would gain wetlands under their control, but there is no real net gain in the amount of wetlands in reality, on the ground. The use of this word is misleading - no wetlands would be gained from the land exchange and could be confused with the Executive Order regarding the no net loss policy regarding wetlands. Clarify in this sentence that the net gain refers only to the refuge gaining wetlands under their control and that it does not mean there is actually a net gain in the amount/acreage/ecological function of actual wetlands [Draft EIS Chapter 4 Page 4-126 Section 4.3.2.2 Paragraph 15, Cumulative effects].</li> </ul>	<p>The Service agrees. The referenced language (and for Alternative 3) has been changed, as recommended by the Corps, to indicate an increase in acres of wetlands to be managed by the Service, but not a net gain in wetlands.</p>
	<ul style="list-style-type: none"> <li>For benefits to wetlands from the land exchange, the alternatives analysis should discuss the negative effects to wetlands from not doing the land exchange - probably because it is obvious there would be no negative effects to wetlands if the land exchange does not go through [Draft EIS Chapter 4 Page 4-237 through 4-238 Section 4.4.2.2 Paragraphs 9, 11, 14].</li> </ul>	<p>The Service disagrees. With no plans to manipulate wetlands within the selected parcel, there are no adverse [negative] effects to wetlands to discuss. The change in ownership of these lands, which would occur as a result of a land exchange, would not necessarily result in effects to wetlands. Wetland protection laws apply regardless of ownership.</p>
	<ul style="list-style-type: none"> <li>Where is the counterbalance for the 13,600 acres of wetlands added to the national wildlife refuge system (86 percent are unique wetlands in congressionally designated wilderness) that for any other project would be considered compensation under the Corps 404 process? If fact, almost of 12 acres of unique wetlands comprising islands in the mouth of Kinzarof Lagoon were added to the Izembek National Wildlife Refuge as compensation for wetlands lost as a direct result of constructing the road authorized in the 2003 EIS [Draft EIS Page 4-107 - Hydrology].</li> </ul>	<p>The Service disagrees that wetlands to be added to the national wildlife refuge system through the proposed exchange would be recognized as compensation for wetlands filled due to road construction in this EIS. Wetland compensation would be considered in the Corps' Section 404 permitting process and is not analyzed in this EIS. The acres of wetlands to be exchanged through the proposed land exchange are already identified in Chapter 4. No additional edits to the EIS were made in response to this comment.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Is there any documentation that would indicate that selection of Alternatives 2 or 3 would affect the status of the Wetlands of International Importance designation? According to Figure 3.2-2, Original Proposed Wetlands of International Importance, only a portion of Alternative 2 and 3 are within the Ramsar designation. However, the text says that both corridors are entirely within the entire Izembek National Wildlife Refuge and Izembek State Game Refuge. The text and figure need to be consistent. The Ramsar boundary needs to be clearly shown on a figure. Suggest that the State Game Refuge boundary be used to illustrate the Ramsar boundary because it encompasses the eelgrass beds [Draft EIS Chapter 4-123, Section 4.3.2.2 paragraph 3].</li> </ul>	<p>The Service agrees that clarification is needed with the display and discussion of the Ramsar area. As stated above, the figure in Chapter 3 has been changed to display the designated Ramsar area, rather than the proposed Ramsar area.</p>
BIO WET 07	<p>The Service needs to consider that while the direct impacts of the road are estimated to be only 3.8 acres of wetlands under Alternative 2, and 2.4 acres under Alternative 3, considering only the areas delineated on a map is contrary to the original intent of designating the entire isthmus region as Izembek National Wildlife Refuge to protect an intact watershed. Wetlands do not function as discreet features on the landscape, and the isthmus in Izembek National Wildlife Refuge is a wetland complex that includes the interaction between uplands where the water table may be higher than the adjacent lowland containing a wetland.</p> <p>Disruption of surface water flow in uplands may impact both surface and subsurface flows, with the latter being an equally important component of wetland hydrology in that groundwater may be the primary source of water in a lowland wetland.</p>	<p>The Service agrees that the analysis of effects on wetlands from Alternatives 2 and 3 should to include a discussion about the interactions of hydrology on wetlands and adjacent uplands within this wetland complex. Language in Section 4.3.2.2 has been revised to include this discussion.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WET 08	At present the Draft EIS describes how King Cove Corporation intends to take its 5,430-acre entitlement from lands currently in the Alaska Peninsula National Wildlife Refuge that are located east of Frosty Peak. These lands would not be subject to Section 22(g) of the Alaska Native Claims Settlement Act (ANCSA) and thus would lose any resource protections that had been afforded by remaining within the Alaska Peninsula National Wildlife Refuge. Before a complete and accurate analysis of the environmental impacts of the proposed action can be made, information regarding the specific lands to be reclaimed by King Cove must be presented to the public. Taking of other lands from the Alaska Peninsula National Wildlife Refuge will significantly reduce any perceived benefits to wetlands that may be associated with the proposed land exchange, road construction, operation, and maintenance.	As stated in response to concern BIO WET 06 (bullet 4) the change in ownership of wetlands does not equate to a beneficial or adverse effect on wetlands. Wetland jurisdiction under the Clean Water Act applies to all wetlands regardless of ownership. Therefore, a change in ownership, whether covered under Section 22(g) or not, would not result in a loss of resource protections for wetlands. No edits have been made in response to this comment.
BIO WET 09	The Service needs to consider and incorporate in the EIS additional data and analysis performed and submitted regarding:	The Service disagrees that additional data needs to be displayed regarding acres of wetlands and miles of shoreline habitats. The analysis already identifies the acres of wetlands added/retained through the proposed land exchanges (Chapter 2 and Chapter 4). Acres of shoreline habitats that meet wetland criteria are included in those acreages. All shoreline habitats below ordinary high water would not be part of the land exchange. The Service also disagrees that Wetlands/Cumulative effects should be changed. As stated in BIO WET 06, a change in land ownership does not equate to an effect on wetlands. Wetland protections under the Clean Water Act apply regardless of ownership.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Acres of Wetlands and Miles of Shoreline Habitat Removed and Added/Retained to the National Wildlife Refuge System, state ownership, and King Cove Corporation ownership for each alternative. [Table 14 King Cove Group comments]</li> </ul>	See above response
	<ul style="list-style-type: none"> <li>• Net Gain or Loss in Acres of Wetlands and Miles of Shoreline Habitat Added or Retained to the National Wildlife Refuge System, state ownership, and King Cove Corporation ownership. [Table 15 King Cove Group comments]</li> </ul>	See above response
	<ul style="list-style-type: none"> <li>• Miles of Shoreline habitats Removed and Added/Retained under Alternative 2 or Alternative 3. [Table 16 King Cove Group comments] and;</li> </ul>	See above response
	<ul style="list-style-type: none"> <li>• Specifically at Page 2-58 Wetlands/Cumulative Effects the chart notes that 12,276 acres of new native plant cover is added to the refuge system, and that the effect is moderate. The effects of the land exchange are negligible and there will be a net increase of almost 13,600 acres of wetlands.</li> </ul>	See above response
BIO WET 10	The effects of exchanging Ramsar or high value wetlands should be re-analyzed in the Final EIS:	See response to each of the sub-components of this statement of concern.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The transfer of up to 13 acres of Ramsar wetlands with an estimated up to 3.8 acres of fill to state ownership under Alternative 2 will have a negligible to minor effect within the context of the overall wetland distribution and function of wetlands on federal and state ownerships in the Izembek National Wildlife Refuge and Izembek State Game Refuge.</li> </ul>	<p>The Service disagrees that the transfer of 13 acres of Ramsar wetlands would be negligible to minor. As stated above, language in Chapter 4 (Section 4.3.2.2) has been modified to include a discussion of how the wetland complex (both uplands and wetlands that are hydrologically connected) would be affected. If Alternative 2 is approved, the Service would report the proposed change to the Ramsar Convention and carry out a re-evaluation to determine if the project would affect the eligibility under the Ramsar criteria.</p>
	<ul style="list-style-type: none"> <li>The transfer of up to 9 acres of Ramsar wetlands with an estimated up to 2.4 acres of fill to state ownership under Alternative 3 will be negligible to minor effect within the context of the overall wetland distribution and function of wetlands on federal and state ownerships in the project area.</li> </ul>	<p>The Service disagrees that the transfer of 9 acres of Ramsar wetlands would be negligible to minor. As stated above, language in Chapter 4 (Section 4.4.2.2) has been modified to include a discussion of how the wetland complex (both uplands and wetlands that are hydrologically connected) would be affected. If Alternative 3 is approved, the Service would report the proposed change to the Ramsar Convention and carry out a re-evaluation to determine if the project would affect the eligibility under the Ramsar criteria.</p>
	<ul style="list-style-type: none"> <li>The addition of 1,235 acres of wetlands located on the Kinzarof Lagoon parcel and retention of the 1,917 acres of Ramsar wetlands on the King Cove Corporation relinquished selection under alternatives 2 and 3 will have a major positive effect since the 3,152 acres will be part of the Izembek Wilderness as prospective Ramsar wetlands.</li> </ul>	<p>Although the change in land ownership from corporation or State to the National Wildlife Refuge system would have recognizable effects for some aspects of resource management, there would be no effect on wetlands because Clean Water Act wetland protections apply regardless of wetland ownership.</p>
	<ul style="list-style-type: none"> <li>The removal of 1,917 acres of Ramsar wetlands from the Izembek Wilderness under alternatives 1, 4, and 5 will have a direct and negative effect to the Ramsar wetland designation.</li> </ul>	<p>Similar to the previous concern, no changes have been made to the EIS in response to this comment because a change in land ownership does not directly equate to the loss or gain in wetlands.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Both Alternatives 2 and 3 will have the same overall effect to wetlands by adding approximately 17,900 acres of high value wetlands and 32 miles of associated shoreline to the National Wildlife Refuge System including 11,723 acres that will be managed as part of the national wilderness preservation system.</li> </ul>	<p>Similar to the previous statements, although the change in land ownership from corporation or State to the National Wildlife Refuge system would have recognizable effects for some aspects of resource management, there would be no effect on wetlands because Clean Water Act wetland protections apply regardless of wetland ownership.</p>
	<ul style="list-style-type: none"> <li>Both Alternative 2 and Alternative 3 will have the same overall effect to wetlands by potentially adding, or retaining existing federal ownership of approximately 3,152 acres of Ramsar designated wetlands; all of which will be managed as part of the national wilderness preservation system.</li> </ul>	<p>Similar to the previous statements, although the change in land ownership from corporation or State to the National Wildlife Refuge system would have recognizable effects for some aspects of resource management, there would be no effect on wetlands because Clean Water Act wetland protections apply regardless of wetland ownership.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Both Alternative 2 and Alternative 3 will add 4,282 acres of waters and submerged land with 2,300 acres of eelgrass habitats in state ownerships to the Izembek state game refuge with the same protection of state owned waters, submerged land, and eelgrass wetlands in the Izembek lagoon complex, or even greater protection than the Izembek lagoon complex because Kinzarof Lagoon will be completely surrounded by wilderness.</li> </ul>	<p>Revisions have been made in Sections 4.3.2.2 and 4.4.2.2 to provide a description of the additional protections to be provided to the Kinzarof Lagoon if it becomes part of the State Game Refuge.</p> <p>The addition of the Kinzarof Lagoon to the Izembek State Game Refuge would provide greater protection for tidelands and submerged lands, including eelgrass beds, and marine water that provide habitat for Steller’s eiders, emperor geese and other waterbirds; harbor seals; and various species of fish. The Alaska Department of Fish and Game would use the Izembek State Game Refuge Management Plan to manage land use activities in the lagoon, including a requirement for a Special Area Permit for any activity that may damage refuge resources, disturb wildlife or disrupt existing public uses. Management of species harvest would be unaffected by the change in land status from general state land to refuge land. However, the Izembek State Game Refuge plans states that the Alaska Department of Fish and Game will work with the Department of Natural Resources to prepare mineral leasehold location orders for the Izembek State Game Refuge, and also recommend that the Department of Natural Resources not offer offshore prospecting permits or leases within the refuge. The departments will recommend that the legislature close the refuge to new locatable mineral entry, mineral prospecting, and mineral leasing under AS 38.05.185-38.05.300.</p>
	<ul style="list-style-type: none"> <li>Alternatives 1, 4, and 5 will result in a direct and permanent loss of 1,917 acres of unique wetlands that may or may not also be designated as Ramsar wetlands of international importance.</li> </ul>	<p>The Service disagrees; the transfer of the selected parcel under Alternatives 1, 4 and 5 would not necessarily equate to a loss of wetlands. There are no reasonably foreseeable future actions that would affect these wetlands; Clean Water Act protections apply regardless of ownership.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Alternatives 1, 4, and 5 will have a significant negative effect to unique, high value wetlands because 1,917 acres of wetlands will be removed from the National Wildlife Refuge System; 4,282 acres of water, and 2,300 acres of eelgrass, and 17 miles of intertidal shoreline used by tens of thousands of waterfowl will not be added to the Izembek State Game Refuge.</li> </ul>	<p>The Service disagrees; the transfer of the selected parcel under Alternatives 1, 4 and 5 would not necessarily equate to a loss of wetlands.</p>
	<ul style="list-style-type: none"> <li>The Service and the Corps should clearly indicate the extent designated Ramsar wetlands of international importance are or are not directly, indirectly, or cumulatively affected by all the land exchange and its alternatives.</li> </ul>	<p>Revisions have been made to Chapter 3 (Section 3.2.2.2), to more clearly describe the area recognized as the Ramsar Wetlands of International Importance. Chapter 4 4 (Section 4.3.2.2 and 4.4.2.2) have been revised to better describe impacts to Ramsar Wetlands of International Importance. If Alternative 2 or 3 is approved, the Service would report the proposed change to the Ramsar Convention and carry out a re-evaluation to determine if the project would affect the eligibility under the Ramsar criteria.</p>

## Biological Resources – Wildlife (BIO WILD)

SOC Code	Statement of Concern (SOC)	Response
BIO WILD	Comments about impacts from road construction and operation to terrestrial and marine wildlife (including waterfowl and marine mammals).	Category Code; no response required.
BIO WILD 01	A road through this ecologically sensitive habitat and narrow confined isthmus would fragment and degrade the integrity of the lagoon complex. This would result in impacts that extend well beyond the road footprint and affect the integrity of the entire refuge. Birds and mammals use the lagoons, isthmus wetlands, tundra, and tidal flats to nest, feed, transit, and forage. In particular:	The concerns expressed in these comments have been described and acknowledged in the EIS; no changes are warranted.
	<ul style="list-style-type: none"> <li>The species most impacted would be those whose essential habitat would be directly or indirectly impacted by road construction, maintenance, traffic and potentially increased predation. Pacific Brant, Steller’s Eiders, Emperor Goose, caribou, Tundra Swans, brown bears, sea otters, sea lions, seals, and whales would be impacted.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Over 90 percent of Black Brant annually migrate to Izembek Lagoon in the fall, making this area critical to migration and overwintering success of Black Brant. The increased human access afforded by either road alternative to areas of high use by Black Brant, especially during hunting season, would significantly increase disturbance levels in areas where such access did not previously exist. This would reduce the refuge area that Black Brant previously used at low or non-existent disturbance levels. Increased direct mortality due to improved access for hunting, avoidance of key habitat, or decreased energy uptake prior to migration due to disturbance could result in significant adverse impacts to the Black Brant population.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Eelgrass also 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 north side of the Alaska Peninsula is a key element in maintaining the productivity of the larger Bering Sea ecosystem. Degradation or loss of this complex could result in substantial population declines for species that rely on the area, as distant uplands or other lands offered in exchange do not offer comparable habitat components that these species need.</li> </ul>	See above response.
BIO WILD 02	The current regulations for protection of the ponds utilized by migratory waterfowl are already significant enough to protect waterfowl nesting and utilization areas. Waterfowl nesting and utilization area are also to be protected under the Migratory Bird Treaty Act regulations.	No edits have been made in response to this comment. Detailed mitigation measures addressing requirements of the Migratory Bird Treaty Act will be fully described in a Mitigation Plan, if the project is approved, and Clean Water Act regulation regarding wetland permitting, administered by the Corps, will address permit requirements.

SOC Code	Statement of Concern (SOC)	Response
<p>BIO WILD 03</p>	<p>The Service needs to consider that wildlife will not be disturbed from the construction, maintenance, and operation of a road and road corridor. Wildlife already is adapted to the extremes of the local physical environment (volcanic ash, earthquakes), human presence and the network of existing roads in Cold Bay and near King Cove and of aircraft over flight as observed by local residents.</p> <p>Vast areas of the refuge will be added to as a result of the exchange and will remain essentially inaccessible to most people and therefore the impact of either road will be minor. In addition nearby, there are vast land areas outside the refuge that are very similar in character that support similar populations of birds and animals, such that the creation of a properly built road on one of these corridors will not be a significant loss.</p>	<p>The Service recognizes the adaptability of many wildlife species to disturbance such as construction and human presence, and some revisions to Chapter 4 have been made for specific species based on other more specific comments found in BIO WILD 04, and BIO WILD 10.</p> <p>However, the Service does not agree that "vast areas outside the refuge are very similar in characters that support similar populations of birds and animals." Further, construction sounds would not be a "normal" sound that wildlife would be adapted to in that environment.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 04	<p>The Service should further consider the impacts to brown bears as a result of a road corridor. 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 isthmus and proposed road corridor. Bears frequently use the isthmus to forage and roam in search for food. While the low levels of human disturbance have helped maintain the high habitat value of this area for brown bears, roads generally have harmful impacts on large carnivores. The construction of roads in what had been roadless brown bear habitat has been shown by many investigators to have significant adverse impacts on bear populations by increasing human access, which results in displacement of bears or the direct mortality of bears through legal hunting, defense-of-life-or-property kills, illegal killing, and road kills. Studies have demonstrated a strong relationship of road construction to increased bear mortality on northeastern Chichagof Island, an increasing probability of brown bears killed in defense-of-life-or-property with increasing road density on the Kenai Peninsula.</p>	<p>Revisions have been made in Section 4.3.2.5 to address this concern in more detail and additional references have been cited to support the analysis.</p>
BIO WILD 05	<p>The Draft EIS fails to adequately include the following information:</p>	<p>See response to each of the sub-components of this statement of concern.</p>
	<ul style="list-style-type: none"> <li>• There is not sufficient information to indicate major effects to fish and several bird species (e.g., Tundra Swans).</li> </ul>	<p>One of the key factors considered in the analysis of effects, especially regarding disturbance to birds, is the degree to which any of the road alternatives would lead to unauthorized use of refuge lands by all-terrain vehicles and associated increases in hunting, fishing, and other activities. There is evidence that the newly constructed road to the hovercraft site has been used by all-terrain vehicle users to access refuge lands on the east and northeast sides of Kinzarof Lagoon and the</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>Joshua Green wilderness area, with tracks concentrated in wet or moist graminoid areas (Sowl 2008c and 2011f).</p> <p>As noted previously, wildlife (focusing on mammals and birds) will adapt to the direct road construction, operation, and maintenance activities. The negative impacts are indirect and cumulative, especially related to increased human access, which includes a variety of activities – pedestrian wildlife viewing, sport/subsistence hunting/gathering, uncontrolled domestic dogs, all-terrain vehicles, snow machine (weather permitting), heavy traffic, use of the road beyond described use, etc.</p> <p>As noted there is no law enforcement capacity at Izembek at present. The EIS cannot offer increased law enforcement, i.e., the obligation of state and/or federal funding for wildlife, wilderness, or vehicles outside of the administrative budgeting process, including the assignment of personnel for this task. This only compounds the increased human access issue noted above.</p> <p>There is also a temporal-spatial aspect of wildlife-habitat-human interactions in that some species are tolerant of disturbance(s) regardless of season or life stage event(s), whereas, others are generally intolerant. For wildlife species in general, periods of resource stress (food limitation) or breeding (calving/nesting) are most sensitive and susceptible to abandonment, if the frequency, intensity, and duration of disturbances goes beyond a threshold that is unique for each species.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Include an analysis of the probability of implied negative effects of hunting overharvest, or the illegal use of motorized vehicles in the wilderness, or for the overharvest of fish including whether federal or state regulatory mechanisms are insufficient/sufficient for handling any potential increases in hunting and fishing pressures to wildlife.</li> </ul>	<p>There is no way to quantify where or how often incursions into refuge lands would occur under the road alternatives but the Service assumes some incursions are likely to occur in spite of any efforts to keep vehicles on the road. It is assumed such incursions by all-terrain vehicles or foot traffic would occur in areas that are attractive for hunting, fishing, berry picking, and other popular recreational activities or allow users to travel more easily to such areas than currently exist without the road. Once a track is established, additional use is more likely and areas currently undisturbed by human activities could be exposed to chronic or periodic disturbance. Given that there is no law enforcement available in the King Cove/Cold Bay area, and the unlikelihood that routine and long term enforcements efforts will be increased by state or federal authorities, it is unlikely that any mechanisms to limit all-terrain vehicle access and related hunting, fishing, and other activities in refuge lands would be effective. In any case, the disturbance effects of increased hunting and other human activities in areas not currently subject to such disturbance could have more serious consequences for several bird species than the increased hunting pressure itself.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>There is an incomplete catalog of species within the Izembek National Wildlife Refuge. It is insufficient to list direct or indirect effects; the Service must consider the cumulative impacts of all of the impacts from road-building [to wildlife]. These include not only impacts from human activities, but also the increase of predators that tend to thrive near human activity, such as common ravens and foxes, which would increase predation pressure on birds during nesting season when eggs and chicks are vulnerable, as well as during molting season when waterfowl are flightless as they grow new feathers.</li> </ul>	<p>The list of bird species in Izembek National Wildlife Refuge is the latest information available according to refuge records. The EIS covers a wide range of potential indirect effects to birds but does not project an increase in foxes and Ravens as a result of new road construction because such increases in predators and scavengers are more associated with human settlements rather than roads. Predation by these species exists under natural conditions and there is no basis to infer increases in predation due to the road or its use. Ravens and foxes may be drawn to animals killed on the road, but given the low traffic volumes and slow speeds, such road kill events are likely to be rare.</p>
BIO WILD 06	<p>Climate change may impact Pacific Black Brant, Steller's Eiders, and caribou whose survival and adaptive capacity may depend on maximizing the availability of undisturbed habitat available. The Service must analyze the effects of the various alternatives in the context of climate change for the full range of species that rely on Izembek National Wildlife Refuge.</p>	<p>Climate change impacts were determined to be negligible for all alternatives, which includes impacts to those habitats from climate change. While overall climate change impacts to those habitats are important and may be major, this EIS is identifying climate change impacts that are related to this specific project and the contribution of this project to cumulative effects.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 07	<p>The EIS needs to note that regarding impacts to migratory birds, experienced local pilots noted that they avoid birds traveling the waterways and do not overfly the ocean side of the coasts. Pilots noted that they do not observe birds present on the lakes though they are present nearer the ocean. They do not encounter flocks of birds between Cold Bay, the little lakes over to Lenard Harbor, on into King Cove, to Port Moller or the way up towards Nelson Lagoon. Pilots do observe that as soon as they encounter the rivers and the waterways, they overfly the inland areas in order to limit disturbances. Pilots noted that they approach Cold Bay from the inland, in the fall, specifically to avoid the bird traffic and never go over Izembek.</p>	<p>No edits were made in response to this comment. The EIS acknowledges that waterfowl use is concentrated in the lagoons, particularly during the migratory seasons, as observed by local pilots, and not throughout the isthmus area between the lagoons. The EIS also explains that large flocks of Emperor Geese and other species move back and forth between the Bering Sea and Pacific sides of the refuge in response to weather conditions and tides. Because of the short distances between the lagoons, this movement is of short duration and less likely to be encountered by pilots, but ground activities along the two proposed road corridors could result in disturbances that may affect these routine movements. The potentially strong response of Brant and other waterfowl to aircraft is noted in several places but the frequency and intensity of such disturbance has not been estimated. Although some experienced pilots apparently avoid bird concentration areas, consistent with their desire to minimize the risk of dangerous collisions with flocks of birds, these flight path choices are optional and do not eliminate the potential for disturbance of birds from either local pilots or those less experienced with bird distributions in the area.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 08	<p>The Service should consider the noise disturbance from off-road vehicles, including all-terrain vehicles and motorcycles, and snow machine use on the road corridor. All-terrain vehicles and motorcycles have noise emissions near 100 dB immediately next to the vehicle and decrease to approximately 80 dB 50 feet away. Snow machines produced after 1976 that are in good working order and certified by the Snowmobiles Safety and Certification Committee's independent testing company emit no more than 73 dB(A) at 50 feet while traveling at 15 miles per hour when tested under SAE J-1161 procedures, but the disturbance may still be harmful to wildlife and should be evaluated in the EIS.</p>	<p>Section 4.3.2.5 addresses the impact of noise associated with increased all-terrain vehicle, motorcycles, and snowmachines use in the project area. Additional analysis is provided in Sections 4.3.1.6 and 4.4.1.6 in order to fully assess the impact of noise from all-terrain vehicles.</p>
BIO WILD 09	<p>The Final EIS should consider that the impacts to Tundra Swans that are associated with the proposed road alternatives will be major and highly significant. Much of the impact to Tundra Swans associated with the road alternatives would be due to inherent sensitivity of these birds to human disturbances and the strong likelihood that the road will bring increased human activities such as wildlife viewing, sport and subsistence hunting, as well as expanded use of all-terrain vehicles for subsistence access in spite of attempts to prevent such access.</p>	<p>The EIS includes a major effect conclusion for Tundra Swans with either of the road alternatives, based largely on the potential for disturbance from road travel and increased access to the refuge from pedestrians and all-terrain vehicles. No changes have been made to the EIS in response to this comment.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 10	<p>The Service needs to reconsider how the proposed road would increase access and have a significant impact on how bears and caribou navigate the refuge and greater area. As a result of greater access to the Joshua Green River, human activities will likely increase and affect movements and distributions of brown bear through increased hunting opportunities and indirectly through increased disturbance. Right now the effect only states major impacts to bears in the isthmus and moderate for project area. It should be restated that impacts will be major for the isthmus and project area [Draft EIS Exec. Summary, p 34, Section ES-Table 6: effects on land mammals].</p>	<p>The impact of increased access on caribou and bears has been appropriately analyzed and assessed. The new road to the Northeast Terminal already provides greater access to the Joshua Green River area; the proposed road would not substantially improve access to that area. The difference in impact level for bears between the isthmus and the project area is because the effects would be greater closer to the road (isthmus area) and lower throughout the rest of the project area as fewer people are expected to travel further from the road.</p> <p>Given the density of bears in the Joshua Green River area and the potential enhanced access via road, a population sink could occur, eventually negatively impacting the local bear population, including minimizing its value for wildlife viewing and/or hunting.</p> <p>No changes were made to the EIS in response to this comment.</p>
BIO WILD 11	<p>Regarding the impacts to Tundra Swans the Service needs to reconsider the impacts of the proposed alternatives, specifically:</p>	<p>The analysis of how many Tundra Swan nest sites would be involved in the different land parcels is helpful information and has been incorporated into the document in the appropriate locations (e.g. Section 4.3.2.4). Construction and operation of either road alternative would result in the permanent loss of high quality swan nesting habitat on the Izembek Isthmus, both from the footprint of the road and a much larger area from disturbance effects, including unauthorized access outside of the roadway from all-terrain vehicles and increased foot traffic. The transfer of land ownership for parcels that also contain high quality swan habitat does not compensate for the permanent</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>loss of habitat on the Izembek isthmus because those other swan habitats already exist and will likely remain undisturbed even without the land ownership transfers. From the standpoint of the unique non-migratory Tundra Swan population, which is the basis for the conclusions about impacts in this section of the EIS, construction of either road alternative would result in a net loss of nesting habitat. From the standpoint of land ownership, the proposed land exchange involved in Alternatives 2 and 3 would provide a net gain for the Izembek National Wildlife Refuge but that change in ownership would not increase the amount of habitat available to nesting Tundra Swans. The caveat for this response is that future land use decisions on the State and King Cove Corporation parcels may cause more swan habitat loss and disturbance than the Izembek road proposal, but there are presently no specific plans for such development on these parcels.</p> <p>Additionally, the uplands of the North Creek Unit (southern half of the State of Alaska lands proposed for land exchange) are not comparable with the wetlands of the Izembek isthmus in terms of Tundra Swan habitat quality because of elevation and vegetation differences and the lack of impoundments of the size required by Tundra Swans.</p>
	<ul style="list-style-type: none"> <li>• Under Alternatives 2 and 3 a net of approximately 12,100 acres of high density use habitat and 3,000 acres of medium density Tundra Swan use habitat and 19,900 acres of low density Tundra Swan use habitat for a total net gain of 35,000 acres of Tundra Swan habitat and nest sites.</li> </ul>	<p>See response above.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Major positive effect by adding a total of 35,200 acres and an average annual number of 6.0 to 6.7 pairs of swans and nests of unique Tundra Swan use and nesting habitat to the National Wildlife Refuge System.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>Major positive effect by adding a total of 27,100 acres of unique Tundra Swan habitat and an average annual number of swan pairs and nests from 4.1 to 4.6 depending on the methodology used that will become part of the National Wilderness Preservation System.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>Negligible to minor effect for the 2 pairs of swan pairs/nests within the overall Tundra Swan habitat/nests in the Izembek National Wildlife Refuge and the 75 mile long area examined in the Service 1998 Land Protection Plan for the Izembek National Wildlife Refuge Complex.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>Negligible to major effect on the 0.5 to 0.6 pairs of Tundra Swan pairs and nests from the Izembek National Wilderness Preservation System under Alternatives 1, 4, and 5.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>Include an unbiased scientific review of 26 years of Service data on Tundra Swan pair and nest for the two proposed road corridors and for the 31,200 acres of unique Tundra Swan habitat, swan pairs and nest that would be transferred to the federal government for management as part of the National Wilderness Preservation System (27,100 acres) and the National Wildlife Refuge System.</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Review the Summary Comparison of Acres of Tundra Swan Use and Nest Sites Added or Removed from the National Wilderness Preservation System under Subtitle E [As Table 18 in additional comment provided by the King Cove Group], and;</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• Summary of Net Gain or Loss of Acres of Tundra Swan Use and Nest Sites Added or Removed from the National Wilderness Preservation System under Subtitle E [As Table 19 in additional comment provided by the King Cove Group].</li> </ul>	See response above.
BIO WILD 12	The Service needs to incorporate additional data concerning Tundra Swans for the Southern Road Alignment and clarify in the Final EIS the data provided in Table 1 through Table 6 of the King Cove Group. Specifically:	<p>The analysis of how many Tundra Swan nest sites would be impacted within different buffer zones of the road alignments is helpful information and has been incorporated into the document in the appropriate locations (e.g. Sections 4.3.2.4 and 4.4.2.4). The Service believes the numbers of swans potentially disturbed would be larger than presented in the provided analysis due to indirect effects of the road (i.e., unauthorized off-road all-terrain vehicle use and increased foot traffic, hunting, fishing, and other activities in this area which currently receives little or no use). The locations and extent of these indirect effects cannot be determined at this time so a comparable quantified analysis of potential nest disturbance from indirect effects is not feasible.</p> <p>This does not preclude the EIS recommendation of a study of indirect impacts to Tundra Swans and other species to be conducted as part of an effort to ensure mitigation measures offset direct, indirect, and/or cumulative impacts to Tundra Swans (Appendix F), if Alternative 2 or Alternative 3 are implemented,.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Considering the Southern Road Alignment first and using data from the Service swan spring nesting surveys (1978-2002) and swan breeding-pair population surveys (2004-2005), it was found that the number of observed breeding pairs within the 1,500-meter buffer of the Southern Road Alignment ranged from 0 to 6, depending on the year [Table 1 of the King Cove Group Comments]. These numbers represent between 0 to 16% of the total number of observed swan breeding pairs recorded in the Izembek refuge for the years 1978 to 2005.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>The numbers of observed swan breeding pairs occurring within the 1,500-meter buffer of the possible road alignment were rather variable among years. This suggests because swans show strong fidelity to nest sites across year that some pairs observed during the survey years with higher numbers of breeding pairs may not actually have been nesting in the area.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>Using all 26 years in the Service data set and projecting forward, data indicate that an average of 2.1 observed breeding pairs could occur within the 1,500-meter buffer of the Southern Road Alignment in a given year [Table 1 of the King Cove Group Comments]. Applying the Service method to derive the estimated number of breeding pairs, these data indicate that an average of 2.5 estimated breeding pairs could occur within the 1,500-meter buffer.</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>For the 800-meter buffer surrounding the Southern Road Alignment, the number of observed breeding pairs ranged from 0 to 3, depending on the year [Table 2 of the King Cove Group Comments]. These numbers represent between 0 to 8% of the total number of observed swan pairs and nests recorded in the Izembek refuge for the years 1978 to 2005. Across all survey years, these data indicate that an average of 0.7 observed breeding pairs (or 0.9 estimated breeding pairs) could occur within the 800-meter buffer of the Southern Road Alignment in a given year.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>There has been no attempt to quantify how many pairs and nests could occur in close proximity to the potential road. It is not sufficient to state that “numerous” pairs and nests could be disturbed/displaced (as is discussed in subsequent sentences in this paragraph) without some sort of quantification of how many pairs and nests might actually occur in close proximity to the potential road. An analysis of Service geospatial data on the locations of Tundra Swan pairs and nests in the Izembek refuge in relation to the Southern Road Alignment proposed in Alternative 2 could be conducted to provide additional information on this topic [Draft EIS p. 4-138, first paragraph].</li> </ul>	See response above.
BIO WILD 13	The Service needs to incorporate additional data concerning Tundra Swans for the Central Road Alignment and clarify in the Final EIS the data provided in Table 3, Table 4 and Table 6 of the King Cove Group Comments. Specifically:	See response for BIO WILD 12 above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Considering the Central Road Alignment, it was found that the number of observed breeding pairs within the 1,500-meter buffer of the road alignment ranged from 0 to 7, depending on the year (Table 3). These numbers represent between 0 to 18% of the total number of observed swan pairs recorded in the Izembek refuge for the years 1978 to 2005.</li> </ul>	See response for BIO WILD 12 above.
	<ul style="list-style-type: none"> <li>Using all 26 years in the Service data set, these data indicate that an average of 1.9 observed breeding pairs (or 2.0 estimated breeding pairs) could occur within the 1,500-meter buffer of the Central Road Alignment in a given year (Table 3).</li> </ul>	See response for BIO WILD 12 above.
	<ul style="list-style-type: none"> <li>The numbers of observed swan breeding pairs occurring within the 1,500-meter buffer of the Central Road Alignment were variable among years. This suggests because swans show strong fidelity to nest sites across years that some pairs observed during the survey years with higher numbers of breeding pairs may not actually have been nesting in the area.</li> </ul>	See response for BIO WILD 12 above.
	<ul style="list-style-type: none"> <li>For the 800-meter buffer surrounding the Central Road Alignment, the number of observed breeding pairs ranged from 0 to 2, depending on the year (Table 4). These numbers represent between 0 to 7% of the total number of observed swan breeding pairs recorded in the Izembek refuge for the years 1978 to 2005. Across all survey years, these data indicate that an average of 0.6 observed breeding pairs (or 0.7 estimated breeding pairs) could occur within the 800-meter buffer of the Central Road Alignment in a given year (Table 4).</li> </ul>	See response for BIO WILD 12 above.

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 14	The Service needs to incorporate additional data at the regional scale regarding Tundra Swan breeding pairs in the Final EIS, specifically:	See response for BIO WILD 12 above.
	<ul style="list-style-type: none"> <li>At a broader, regional scale (the boundary of the Izembek refuge was used as the regional scale), the mean of 2.1 observed breeding pairs represents, on average, 5.7% of the total annual average number of observed swan breeding pairs (34.6) recorded in the Izembek refuge during the survey years of the [Table 1 King Cove Group Comments]. For estimated breeding pairs, the mean of 2.5 breeding pairs within the 1,500-meter buffer represents 6.1% of the total annual average number of estimated swan breeding pairs (38.2) recorded in the Izembek refuge.</li> </ul>	See response for BIO WILD 12 above.
	<ul style="list-style-type: none"> <li>At the regional scale of the Izembek refuge, the mean of 0.7 observed breeding pairs represents, on average, 2.0% of the total annual average number of observed swan breeding pairs (34.6) recorded in the Izembek refuge during the 26 survey years [Table 2 of the King Cove Group Comments]. For estimated breeding pairs, the mean of 0.9 breeding pairs within the 800-meter buffer represents 2.2% of the total annual average number of estimated swan breeding pairs (38.2) recorded in the Izembek refuge.</li> </ul>	See response for BIO WILD 12 above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>At the regional scale of the Izembek refuge, the mean of 1.9 observed breeding pairs represents, on average, 5.3% of the total annual average number of observed swan breeding pairs (34.6) recorded in the Izembek refuge during the survey years [Table 3 of the King Cove Group Comments]. For estimated breeding pairs, the mean of 2.0 breeding pairs within the 1,500-meter buffer represents 5.1% of the total annual average number of estimated swan breeding pairs (38.2) recorded in the Izembek refuge.</li> </ul>	See response for BIO WILD 12 above.
	<ul style="list-style-type: none"> <li>At the regional scale of the Izembek refuge, the mean of 0.6 observed breeding pairs represents, on average, 1.7% of the total annual average number of observed swan breeding pairs (34.6) recorded in the Izembek refuge during the 26 survey years [Table 4 of the King Cove Group Comments]. For estimated breeding pairs, the mean of 0.7 breeding pairs within the 800-meter buffer similarly represents 1.7% of the total annual average number of estimated swan breeding pairs (38.2) recorded in the Izembek refuge.</li> </ul>	See response for BIO WILD 12 above.
BIO WILD 15	Regarding Tundra Swan observations on lands that are proposed for the exchange the Service should consider in the Final EIS that:	See response for BIO WILD 11 above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Twenty six years of Tundra Swan observations for the 5,430 acres the King Cove Corporation will relinquish has approximately 3,800 acres of unique high density abundant habitat that is used by up to 3 pairs and nests combined with most years having none. Annual observations show the number of nesting swan pairs and nests ranging from none to 3 pairs with an annual average of 0.5 to 0.6 depending on the methodology used. Under Alternatives 1, 4, and 5 this unique Tundra Swan habitat would be removed from the Izembek Wilderness.</li> </ul>	See response for BIO WILD 11 above.
	<ul style="list-style-type: none"> <li>• In the area of King Cove Corporation lands at the mouth of Kinzarof Lagoon, rather few swan breeding pairs were observed during the 26 survey years represented in the Service data set; an annual average of 0.1 observed breeding pairs and 0.1 estimated breeding pairs was recorded across all years (Tables 5 and 6 King Cove Group Comments).</li> </ul>	See response for BIO WILD 11 above.
	<ul style="list-style-type: none"> <li>• Few swans were found breeding in the King Cove Corporation ANCSA-selected lands (an annual average of 0.5 observed breeding pairs or 0.6 estimated breeding pairs was recorded across all years).</li> </ul>	See response for BIO WILD 11 above.
	<ul style="list-style-type: none"> <li>• More swans are found in the King Cove Corporation lands at Mortensen's Lagoon, with an annual average of 1.9 observed breeding pairs or 2.1 estimated breeding pairs recorded across all survey years.</li> </ul>	See response for BIO WILD 11 above.

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 16	Regarding Tundra Swan observations on lands that are proposed for the exchange on the Kinzarof Parcel, the Service should consider in the Final EIS that twenty six years of Tundra Swan observations for the 2,604 acres of the Kinzarof Lagoon Parcel show an estimated 2,604 acres of high density abundance and nests for Tundra Swan. Annual observations show that the number of nesting swan pairs and nests range from none to 1 pair with an annual average of 0.1 [for additional data and methodology used see King Cove Group Comments].	See response to BIO WILD 11 above
BIO WILD 17	Regarding Tundra Swan observations on lands that are proposed for the exchange on the Mortensen's Lagoon area, the Service should consider in the Final EIS that twenty six years of Tundra Swan observations for the 8,092 acres of the Mortensen's Lagoon Parcel show an estimated 4,000 acres of high density abundance, 3,000 acres of medium density abundance and 1,100 acres of low density abundance habitats and nests for Tundra Swan. Annual observations show that the number of nesting swan pairs and nests range from none to 9 pairs with an annual average of 1.9 or 2.1 [for additional data and methodology used see King Cove Group Comments].	See response to BIO WILD 11 above
BIO WILD 18	Regarding Tundra Swan observations on lands that are proposed for the exchange on the state parcel, the Service should consider in the Final EIS these edits:	The data provided in the comments on swan distribution in the various land parcels is valuable and had been incorporated into the document in the appropriate locations (e.g. Section 4.3.2.4).

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>At Draft EIS Figure 3.2-13 shows the state parcel as blank ("no data available") which is incorrect as Tundra Swan data [provided in the King Cove Group comments] has 26 years of data for the state parcel. Projecting the habitat lines to the east and west of the state parcel with consideration to the land cover data shown in the Draft EIS Figure 2.3-2 and the actual Tundra Swan pairs/nest data [Figure 4, King Cove Group comment] indicates an estimated 20,700 acres of high and medium density abundance for Tundra Swans.</li> </ul>	<p>The data provided in the comments on swan distribution in the various land parcels is valuable and had been incorporated into the document in the appropriate locations (e.g. Section 4.3.2.4).</p>
	<ul style="list-style-type: none"> <li>Twenty six years of Tundra Swan observations for the 41,887 acres of the state parcel indicates that the Kinzarof has an estimated 1,900 acres of high density abundance and 18,800 acres of medium density abundance and nests for Tundra Swan. Annual observations show the number of nesting sawn pairs and nests range from none to 7 pairs with an annual average of 3.5 or 3.8 pairs and nests depending on the methodology. This Tundra Swan habitat is considered unique since the entire 41,887 acres will be added to the National Wilderness Preservation System. It is noted that the 20,700 acres of Tundra Swan habitat and nests are not located within the external boundaries of the Izembek National Wildlife Refuge and has more acreage and more swan pairs and nests than the combined total of all other parcels.</li> </ul>	<p>The data provided in the comments on swan distribution in the various land parcels is valuable and had been incorporated into the document in the appropriate locations (e.g. Section 4.3.2.4).</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Of the five land parcels examined, the northern parcel of State of Alaska lands to the northeast of the Izembek refuge supports the greatest number of breeding swans (an annual average of 3.4 observed breeding pairs or 3.8 estimated breeding pairs was recorded across all years). The southern parcel of State of Alaska lands, on the other hand, supports few breeding swans, with an annual average of 0.1 observed breeding pairs and 0.1 estimated breeding pairs recorded across all survey years.</li> </ul>	<p>The data provided in the comments on swan distribution in the various land parcels is valuable and had been incorporated into the document in the appropriate locations (e.g. Section 4.3.2.4).</p>
BIO WILD 19	<p>The Service needs to review impacts to nesting bird species and revise specifically the following areas of the EIS:</p>	<p>The potential effects on birds due to dust accumulation on plants next to any new road are considered negligible given the projected low traffic volume of the road alternatives and the wet climate in the Izembek area. Conservation concerns for Rock Sandpipers are described in Section 3.2.4.11. The Final EIS has been updated and incorporates as much information on bird distributions in the various parcels as is currently available.</p>
	<ul style="list-style-type: none"> <li>Consider potential effects of increased road dust on adjacent plant and nesting bird species [Draft EIS Exec. Sum, page 30, Section ES-Table 6: Plant effects]. Studies at Denali National Park and Preserve may provide some insight on potential impacts. Increased dust from the road could impact nesting densities of Rock Sandpipers, which are significant in the isthmus in June. There is no mention of a conservation concern for this species in Chapter 3 at Section 3.2.4.11.</li> </ul>	<p>See response above.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The Draft EIS Figure 3.2-16 provides only a partial disclosure of the location of Bald Eagle nests in the general area. Nests are shown only for the Mortensen's Lagoon Parcel and for the two road alignments in the Blinn Lake tract that will be administratively transferred from the Alaska Peninsula National Wildlife Refuge to the Izembek National Wildlife Refuge under Alternatives 2 or 3. Eagle nest sites associated with the state parcel or for Sitkinak Island Parcel are not shown. The Draft EIS does not clearly indicate whether the nest associated with the Mortensen's Lagoon Parcel is or is not on King Cove Corporation ownership or if so, King Cove Land that will be transferred to the Alaska Peninsula National Wildlife Refuge under either Alternative 2 or Alternative 3.</li> </ul>	<p>See response above. The referenced eagle nest is located on lands to be retained by King Cove Corporation.</p>
	<ul style="list-style-type: none"> <li>The Draft EIS [P. 4-133] points out that the 41,887 acres of state lands have not been covered by many bird surveys. While this may be the case, on the maps showing distribution for Emperor Goose (Fig. 3.2-10), Brant (Fig. 3.2-10) and Tundra Swans (Fig. 3.2-13) the state parcels are simply labeled "no data available." While there may be little specific data available, it is unlikely that no data are available for these parcels. For example, the map for Tundra Swans shows a high density use area directly adjacent to the east of the state parcel and a low density use area to the west. The Draft EIS even notes that Tundra Swan surveys are conducted each spring over lands within or adjacent to the Izembek National Wildlife Refuge. The Alaska Peninsula Refuge website indicates that it surveys Tundra Swans every five years both inside and outside refuge boundaries. Aerial surveys of waterfowl are conducted regularly along the north side of the Alaska Peninsula and data sources should be reviewed more closely and any relevant data for these parcels included in the Final EIS.</li> </ul>	<p>See response above.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 20	The Service should consider clarifying these discussions regarding how and where wildlife is hunted in the text of the EIS:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>Update wording to differentiate between state and federal hunts (see 2011-2012 Alaska Hunting Regulations; available at <a href="http://hunt.alaska.gov">hunt.alaska.gov</a>): Suggested replacement text: Although limited, the overall moose population of the local game management unit (Unit 9D) sustains a federal hunting season with a regulated harvest quota of 10 moose (Service 2010c) and a resident-only state hunting season (Alaska Department of Fish and Game 2011x) [Chapter 3, Page 3-156, Sec. 3.2.5, Paragraph 2].</li> </ul>	The recommended replacement text has been incorporated into Section 3.2.5.1.
	<ul style="list-style-type: none"> <li>The EIS identified the major impact on the Black Brant, the Steller's Eider, and the Emperor Goose and those particular birds to some people are considered shorebirds. Observations by local residents noted that during migration Black Brant, as they migrate from the Yukon Delta area to the Izembek area never fly over the land and fly the coastline. These birds go to a place called Bear River, which used to be an Aleut village and they then veer to the south and come directly to Izembek Bay. Never once did one observer note that they flew over land. In addition it was noted by one local resident that "in all the years I've spent in Cold Bay hunting and fishing, I've never once seen a flock of Black Brant nor Emperor Goose right over the isthmus." Steller's Eiders reportedly molt in the Izembek Lagoon but have not been observed to fly over that isthmus but instead are considered by locals to be shorebirds that fly along the coast coming in from Cold Bay to Kinzarof Lagoon just in small groups. They do not reportedly fly on the isthmus and fly in from the south into Kinzarof Lagoon.</li> </ul>	<p>The classification of birds as waterfowl or shorebirds has been made on standard taxonomic divisions rather than where they are commonly observed. The analysis of effects on these species is based primarily on disturbance that would occur in coastal areas due to increased hunting pressure and improved access to areas that are currently very difficult to access and serve as refuges from hunting disturbance.</p> <p>Black Brant as a species demonstrate a reluctance to fly over <u>large</u> land masses (Kramer 1976), in a manner similar to raptors avoiding flight over large water bodies, i.e., Gulf of Mexico. Black Brant <u>do</u> regularly fly overland in the isthmus. This fact has been documented in numerous studies, particularly between Kinzarof and Izembek Lagoons and Cold Bay for opportunistic feeding depending on weather conditions. See also responses to BIO WILD 01 and BIO WILD 07.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 21	The Service should consider clarifying these discussions regarding wolverines in the text of the EIS for the following reasons:	The recommended replacement text has been incorporated into Section 3.2.5.5.
	<ul style="list-style-type: none"> <li>• Sealing records show that wolverines are harvested and occur throughout subunit 9D (Caribou River, David River, Joshua Green River, Cathedral River, Black Hill, Pavlof Bay, King Cove, Cold Bay), and certainly occur on nearby portions of the study area outside Izembek National Wildlife Refuge. Because of their large home range and solitary nature, it is assumed that wolverines have the potential to occur on the other nearby portions of the study area. Suggested replacement text: Because of their large home range and solitary nature, it is assumed that wolverines occur on the other nearby portions of the study area – or instead note that wolverines also occur on the other nearby portions of the study area [Draft EIS Chapter 3, Page 3-161, Sec. 3.2.5, Paragraph 2, page 162, Section 3.2.5, paragraph 6, Chapter 3, Page 3-163, Sec. 3.2.5, Paragraph 2 Chapter 3, Page 3-163, Sec. 3.2.5, Paragraph 6 Chapter 3, , Page 3-164, Sec. 3.2.5, Paragraph 3].</li> </ul>	See response above.
BIO WILD 22	The Service should consider clarifying these discussions regarding large mammals in the text of the EIS as follows:	See response to each of the sub-components of this statement of concern.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>In the discussion of brown bear on state land in Chapter 3 [Draft EIS p. 3-162] the Draft EIS notes that the refuge areas immediately east and west of this parcel are designated under a Service ranking system as "high density - spring summer and fall" and the area immediately south is designated "high density - denning" and "medium density - spring, summer and fall." The Draft EIS then points out that state lands are not designated under this ranking system. Figure 3.2-17 [Draft EIS pg. 3-145] does show the state parcels as "high density" spring summer and fall. The discussion in Chapter 3 should be revised to reflect the information on the map.</li> </ul>	<p>The discussion in Chapter 3 has been revised to be consistent with what is displayed on the figure, and the references cited on Figure 3.2-17 have been corrected.</p>
	<ul style="list-style-type: none"> <li>In the discussion of caribou, the Draft EIS contains a similar statement - that adjacent refuge lands east and west of the state parcel are designated "high density - winter range/migration corridor." Maps included in the Izembek State Game Refuge Plan depict the state parcels as "known winter use and calving use areas." This information is reflected in the map in the Draft EIS [Figure 3.2-22; pg. 3-153]. However, the final EIS should be revised to include information about caribou density in the state parcels.</li> </ul>	<p>The caribou relative abundance figure 3.2-21 and the winter use area displayed on Figure 3.2-22 are consistent with the references cited. The text regarding caribou in Section 3.2.5.1 has been revised to clarify what is known about caribou density on the State parcels.</p>
	<ul style="list-style-type: none"> <li>Revise dates that predator control was active. Suggested replacement text: Wolves occur on the state parcel. This is part of the area subject to wolf control implemented by the Alaska Department of Fish and Game from 2008 to 2010, in an attempt to stabilize the caribou herd decline due to wolf predation of calves [Draft EIS. Chapter 3, Page 3-162, Sec. 3.2.5, Paragraph 5].</li> </ul>	<p>The sentence regarding predator control has been revised to include the dates predator control was active.</p>
BIO WILD 23	<p>The Service should consider clarifying these discussions regarding marine mammals in the text of the EIS, specifically:</p>	<p>See response to each of the sub-components of this statement of concern.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Some disturbance effects from the operation and maintenance of the road are possible. Harbor seals using Kinzarof Lagoon might be able to hear road traffic along the isthmus part of the road at its nearest points to Kinzarof Lagoon. Previous survey information suggests that the haul out is likely used for pupping. Studies on harbor seal haul out areas have shown animals use the same areas for critical resting periods year round as are used for pupping (May-June) and molting activities (August-September). To state that harbor seals would not be disturbed or displaced by such noise, unless they were pupping or nursing in that area in the Draft EIS is inaccurate [Draft EIS Chapter 4, Page 4-164, Sec. 4.3.2.6, Paragraph 3].</li> </ul>	<p>The concern regarding disturbance to harbor seals in Section 4.3.2.6 requires additional data to further assess. Text was modified to note that some disturbance could occur, but is likely to be minimal. Stating anything further without survey data is not feasible.</p> <p>The commenter did not provide the survey information upon which this statement is based. Acquiring the data would facilitate adequately analyzing the accuracy of the statement and likelihood for disturbance under alternatives 2 and 3. Harbor seals are more sensitive to disturbance during pupping and molting periods, so are more likely to be disturbed during those times than at other times.</p>
	<ul style="list-style-type: none"> <li>Change sentence to reflect the assumption of harbor seal pups in the area. A new road could provide increased access for waterfowl hunting. Hunters shooting toward marine habitat could potentially disturb adult harbor seals. Suggested replacement text: “The new road could provide increased access for waterfowl hunting. Hunters shooting toward marine habitat could potentially disturb harbor seals” [Draft EIS, Chapter 4, Page 4-164, Sec. 4.3.2.6, Paragraph 5].</li> </ul>	<p>The sentence has been changed as suggested.</p>
	<ul style="list-style-type: none"> <li>Note in the EIS that Alternative 2 and 3 would have the same effect on harbor seal habitat and populations. However, a road in the southern corridor would provide a buffer of wilderness between the boundary of the corridor and the shores of Kinzarof Lagoon where as a road in the central corridor does not.</li> </ul>	<p>The commenter may have the roads reversed in this statement, as the buffer between the road corridor and Kinzarof Lagoon is larger with the central alignment (Figure 2-3) than with the southern alignment (Figure 2-2). No changes have been made to the text.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Alternatives 2 and 3 would have direct positive effects on harbor seals as known haul outs would be conveyed by the King Cove Corporation to federal ownerships for management as part of the National Wildlife Refuge system. Haul outs on the island at the mouth of Kinzarof Lagoon donated by the King Cove Corporation to the federal government would then be managed as part of the National Wilderness System.</li> </ul>	<p>This is noted in the text in Section 4.3.2.6.</p> <p>Seals are protected by the Marine Mammal Protection Act regardless of land ownership.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The addition of the Izembek Lagoon with 4,282 acres of state waters and submerged land which includes 2,300 acres of eelgrass beds and 17 miles of intertidal shoreline to the Izembek State Game Refuge will afford protection to harbor seal habitat in the same manner as does the Izembek Lagoon complex.</li> </ul>	<p>Revisions to Sections 4.3.2.2, 4.3.2.6 and 4.4.2.6 have been made to describe the State management procedures that would result from the designation of Kinzarof Lagoon to be part of the Izembek State Game Refuge, and the potential effects on marine mammals. Since seals are protected by the Marine Mammal Protection Act, no effects are estimated for this species.</p> <p>The addition of the Kinzarof Lagoon to the Izembek State Game Refuge would provide greater protection for tidelands and submerged lands, including eelgrass beds, and marine water that provide habitat for Steller's eiders, emperor geese and other waterbirds; harbor seals; and various species of fish. The Alaska Department of Fish and Game would use the Izembek State Game Refuge Management Plan to manage land use activities in the lagoon, including a requirement for a Special Area Permit for any activity that may damage refuge resources, disturb wildlife or disrupt existing public uses Management of species harvest would be unaffected by the change in land status from general state land to refuge land. However, the Izembek State Game Refuge plans states that the Alaska Department of Fish and Game will work with the Department of Natural Resources to prepare mineral leasehold location orders for the Izembek State Game Refuge, and also recommend that the Department of Natural Resources not offer offshore prospecting permits or leases within the refuge. The departments will recommend that the legislature close the refuge to new locatable mineral entry, mineral prospecting, and mineral leasing under AS 38.05.185-38.05.300.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The transfer of the former United States Coast Guard parcel on Sitkinak Island to the state will have no measurable effect to harbor seal haul outs since there are no haul outs involved on the Sitkinak Island parcel, and marine waters would still be in public management by the state.</li> </ul>	<p>Harbor seals do currently haul out on or adjacent to two parcels under consideration for exchange on Sitkinak (see section 3.2.6.5). Exchange of ownership is unlikely to affect seals, as noted. Text in sections 4.3.2.6 has been clarified.</p>
	<ul style="list-style-type: none"> <li>Revise the analysis of Alternative 1 to reflect no hovercraft effect on Marine Mammals and include a rewrite of mitigation measures now not needed [Draft EIS, p 4- 35-41 - Marine Mammals].</li> </ul>	<p>The Marine Mammals section of Alternative 1 has been revised, and the mitigation measures list has been updated to be consistent with changes to Alternative 1.</p>
	<ul style="list-style-type: none"> <li>Address potential effects to harbor seals during pupping. Noise generated from construction activities at the Cold Bay dock could elicit behavioral responses from harbor seals, killer whales, harbor porpoise, or gray whales near the dock. Construction would require driving 180 spin-fin piles into the seafloor alongside the existing dock. Noise from pile driving activities may mask marine mammal vocalizations or cause deflection or avoidance of an area (David 2006; Tougaard et al. 2009; Warsig et al. 2000). The 2003 EIS acknowledged the potential for noise disturbance and assumed that pile driving would be suspended overnight to avoid unnecessary disturbance to nearby residences in the City of Cold Bay. Noise would likely result in some level of temporary displacement or avoidance of the area by harbor seals, killer whales, harbor porpoise, and gray whales during pile driving activities. [Draft EIS Chapter 4, Page 4-365, Sec. 4.6.2.6, Paragraph 4].</li> </ul>	<p>The text and references following the first sentence in the comment were taken directly from the EIS text, so those are references that were already cited and are not provided by the commenter. Text was clarified to address pupping.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 24	The EIS does not adequately describe the impacts to caribou and should clarify the following points:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>The Draft EIS current analysis for caribou completely fails to consider climate change which may have significant impacts on the energy demands, survival, and reproduction of the Southern Alaska Peninsula Caribou Herd. Caribou are sensitive to human disturbance, and their movements would be interrupted by the road and road barriers. The Draft EIS's current analysis for Alternatives 2 and 3 discusses impacts from the road, including human disturbance and limitations to caribou movements across the isthmus, but it makes no mention of climate change. The cumulative impact analysis completely fails to consider how climate change might increase the vulnerability of these caribou.</li> </ul>	The analysis of cumulative impacts to land mammals including caribou has been revised to include the effects of climate change.
	<ul style="list-style-type: none"> <li>Inadequate biological assessment of increased access to the Southern Alaska Peninsula Caribou Herds calving grounds. The Southern Alaska Peninsula Caribou Herd is below the minimum population management objective as established by the Service. Potential negative impacts to the Southern Alaska Peninsula Caribou Herd due to increased access to critical habitat for the herd has not been adequately analyzed.</li> </ul>	The impacts of increased human and predator access to caribou calving grounds were described thoroughly in Section 4.3.2.5. The impact level was assessed appropriately as moderate because the impacts would be localized in the vicinity of the road. Therefore, no revision in the impact assessment is necessary. Section 3.2.5.1 has been revised to recognize that the herd is currently below management objectives and that an operational plan has been developed and adopted by both the Alaska Board of Game and the Federal Subsistence Board.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Alternative 2 and Alternative 3 will add about 50,586 acres of high density winter/migration habitat including about 36,000 acres of high density calving located in the state parcel (Draft EIS Figures 3.2.21 and 3.2-22). All of the 36,000 acres of high density calving habitat will have maximum protection against future development because it will be managed as part of the National Refuge System as wilderness. In total, Subtitle E will result in 42,764 acres of key caribou habitat which will be managed as congressionally designated wilderness [See Tables 20 and 21 of King Cove Group comments]. Alternative 2 would have the least effect on caribou as it is further from the shore of the Izembek Lagoon Complex and avoids higher elevations.</li> </ul>	<p>The acreages of caribou calving habitat to be added to the refuge have been inserted into the discussion of effects of Alternative 2 in Section 4.3.2.5. However, there is no proposed development on these lands if they are retained in State or King Cove Corporation ownership. The differences in effect between Alternatives 2 and 3 are described in Section 4.4.2.5. The comment regarding Alternative 2 avoiding higher elevations has been added to the discussion.</p>
	<ul style="list-style-type: none"> <li>The EIS should be revised to reflect that caribou would not use the habitats south of the two proposed road corridors as the EIS concludes the probability of a road deflecting movements is low.</li> </ul>	<p>The project is not expected to cause caribou to abandon the habitats south of the road, therefore no revision is necessary.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The Draft EIS states that direct and indirect impacts to caribou would be medium intensity, long-term (behavioral disturbance) and permanent (habitat alteration) in duration, could extend to an area larger than the road corridor (regional extent), and would affect important resources. The summary impact of Alternative 2 on caribou is considered moderate. An exception to this impact level determination would be if the road proves to be a barrier to caribou migration. In that case, the impact level for caribou would be major. However, the likelihood of that outcome is judged to be low. Response: The impact analysis for caribou (Draft EIS p. 4-152 to 4-156) is carefully presented and the assessment of an overall impact level seems appropriate (i.e., the listing of moderate effects overall for caribou is in accordance with the Draft EIS guidance on deriving summary impact levels from impact criteria, as noted on p. 4-4). The Draft EIS correctly points out that although deflection of caribou movements and delays in crossing the proposed road are possible, the likelihood of the road becoming a perennial barrier to caribou migration is low. The impact assessment for caribou could be improved, however, by specifically addressing impacts both at the local (isthmus) and regional (project area) scales as was done in the brown bear impact assessment [Draft EIS, Chapter 4 - Alternative 2 Land Mammals - Large Mammals section, p. 4-157, second paragraph].</li> </ul>	<p>Impacts to caribou were not discussed in terms of local and regional because they migrate, it is the same caribou being affected locally and regionally. Because they use such a large area, the entire effects analysis is regional.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The Draft EIS states, “Repeated disturbance by humans on foot during calving greatly increases the risk of calf abandonment and/or physical injury. Additionally, repeated disturbance results in adult caribou moving farther and remaining away longer from the point of disturbance.” Suggested replacement text: Repeated disturbance by humans on foot results in adult caribou moving farther and remaining away longer from the point of disturbance [Draft EIS Chapter 4, Page 4-153, Sec. 4.3.2.5, Paragraph 3].</li> </ul>	<p>The suggested replacement text regarding repeated disturbance by humans on foot has been inserted in Section 4.3.2.5.</p>
	<ul style="list-style-type: none"> <li>The Draft EIS states, “As the proposed road corridor is far removed from caribou calving grounds, mention of disturbance during calving is not germane to this discussion: The combination of noise and human disturbance, e.g., all-terrain vehicle traffic, during the calving period could have significant impact and displace caribou from the road alignments.” Suggested replacement text: The combination of noise and human disturbance, e.g., all-terrain vehicle traffic, could have significant impact and displace caribou from the road alignments. [Draft EIS Chapter 4, Page 4-153, Sec. 4.3.2.5, Paragraph 4].</li> </ul>	<p>As suggested, the text, "during the calving period" has been removed from Sec. 4.3.2.5.</p>
	<ul style="list-style-type: none"> <li>Include observations by local residents that caribou rear in Caribou Flats and then they forage. They go back and forth between their eating, and they parallel that road. One local resident from Cold Bay noted they had never watched caribou go from Izembek to Kinzarof Lagoon but that these animals are always paralleling along there. And for the most part that the larger herds have been closer to Izembek than the actual proposed road corridor.</li> </ul>	<p>The Service has relied on scientific and agency data concerning caribou ecology for this EIS. The Service declined to insert the request local observational information regarding caribou in the EIS.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 25	<p>The impact analyses for furbearers [Draft EIS p. 4-158 to 4-160] and small mammals [Draft EIS pp. 4-160 to 4-162] appear to be reasonable and the assessment of an overall impact level of minor seems appropriate for both species groups. The listings of minor effects overall for furbearers and small mammals is in accordance with the Draft EIS guidance on deriving summary impact levels from impact criteria, as noted on Draft EIS p. 4-4. The furbearers and small mammals impact assessments could be improved, however, by specifically addressing impacts both at the local (isthmus) and regional (project area) scales as was done in the brown bear impact assessment [Draft EIS Chapter 4 Alternative 2 - Land Mammals - Furbearers and Small Mammals sections, p. 4-159, fifth paragraph, and p. 4-161, fifth paragraph].</p>	<p>The suggested revision for small mammals already exists in the EIS. The Service did not make separate assessments of local and regional populations of furbearers because the assessment for both populations is minor.</p>
BIO WILD 26	<p>The Service needs to clarify the following impacts to migratory birds:</p> <ul style="list-style-type: none"> <li>• The Draft EIS acknowledges that climate change is occurring due to greenhouse gas emissions, but it fails to analyze the effects of the alternatives on Black Brant in the context of a changing and stressed environment. Increased populations of wintering Black Brant in the northern end of their flyway are already evident in Alaska. This northern shift will likely result in an increased number of Black Brant wintering at Izembek National Wildlife Refuge. Any threats to the Alaska wintering population have implications for the entire Pacific Flyway population of Black Brant. It is important to limit adverse impacts from human development and disturbance, because this species is experiencing a long-term population decline across its range.</li> </ul>	<p>See response to each of the sub-components of this statement of concern.</p> <p>Comments have suggested the addition of several references dealing with the effects of climate change on Brant and other birds. Some of these references were cited in Section 3.2.4.2 in the Draft EIS. The suggested references have also been incorporated into the appropriate cumulative effects sections of the Final EIS.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The Draft EIS cumulative analysis is incomplete and inaccurate and makes no mention of climate change impacts to Black Brant distribution and reproductive success, nor how increased human disturbance may further amplify the negative impacts of climate change on Black Brant.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>A scientific analysis of these two Service data sets shows the Service clearly reached an effects conclusion for Tundra Swan in the Draft EIS that is not supported by its own data [See ABR report "Review of Impact Assessments for Terrestrial Wildlife in the Izembek National Wildlife Refuge Land Exchange/Road Corridor Draft EIS" May 2012].</li> </ul>	See responses for BIO WILD 11 and 12.
	<ul style="list-style-type: none"> <li>The Draft EIS makes several unsubstantiated claims in the cumulative effects section for Birds. For example, it states that the completion of the King Cove Access Road may result in more hunting for waterfowl and other species (e.g. seals) at Kinzarof Lagoon and the northeast side of Cold Bay, which could disturb waterfowl and other birds as well but this conclusion is not supported.</li> </ul>	The Service believes that any road through the Izembek isthmus will inevitably result in unauthorized off-road all-terrain vehicle use in the refuge with associated increases in hunting, fishing, and other activities in areas that are currently inaccessible. This belief is based on observations of similar off-road incursions after the road to the hovercraft site was constructed (Sowl 2008c and 2011f).

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Biological assessments of gun fire on staging geese populations have not been adequately analyzed. I have personally hunted geese in the refuge and have set tens of thousands of geese to flight with a single gunshot. Black Brant has a limited window for beginning their migration south.</li> </ul> <p>The impacts of gunfire during this short, critical period, is inadequately analyzed in the EIS. Proposed limits on sport hunting times of year in the refuge in response to increase access have not been considered adequately. Proposed limits on types of weapons allowed in the refuge in response to increase access have not been considered.</p>	<p>The disturbance impacts of gunfire on Brant and other waterfowl have been addressed in the EIS and form one of the primary bases for the major effects conclusion on Brant. The issues of potential hunting management changes to address increased hunting pressure are not addressed in the EIS because there have been no specific proposals for any new hunting regulations.</p>
BIO WILD 27	<p>The impact analysis for seabirds [Draft EIS pp. 4-146 to 4-148] appears to be reasonable and the assessment of an overall impact level of minor seems appropriate. The listing of minor effects overall for seabirds is in accordance with the Draft EIS guidance on deriving summary impact levels from impact criteria, as noted on p. 4-4. The seabird impact assessment could be improved, however, by specifically addressing impacts at both a local and regional scale [Draft EIS Chapter 4 - Alternative 2 - Birds - Seabirds section, p. 4-157, third paragraph].</p>	<p>The effects analysis on seabirds looks at the potential for disturbance and other localized effects but assesses these effects on the populations of seabirds. No changes have been made in response to this comment.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 28	<p>The Service needs to clarify how in the impact assessment for birds under Alternative 3, the impact intensity, which was low for Alternative 2, has been elevated to low to high. This reflects the possibility that hunting pressure could have greater effects under Alternative 3 because the proposed road would be closer to Izembek Lagoon (Izembek Lagoon supports greater numbers of nonbreeding waterfowl than Kinzarof Lagoon and therefore more mortality could occur). The overall impact level of major, however, is the same as for Alternative 2. It would be helpful also in this impact assessment to provide some additional information on the likelihood and magnitude of any increases in hunting pressure in Izembek Lagoon as result of the construction and use of the proposed road. This is an important point because it is the possibility of increased hunting pressure that is the stimulus for elevating the overall impact level to major. It is not sufficient to consider that there could be a substantial increase in hunting pressure (and to use that possible increase to reach a conclusion of major overall impacts) without an estimate of the likelihood and magnitude of any increases in hunting pressure in Izembek Lagoon [Draft EIS, Chapter 4 Alternative 3 - Birds - Brant, Emperor Goose, and Other Migrating/Wintering Birds section, p. 4-245, second paragraph].</p>	<p>Under Alternative 2, the summary statement for direct and indirect effects of road operation and maintenance on Brant, Emperor Geese, and other migrating/wintering birds was in error and the Final EIS has been corrected to indicate that the intensity of effects would be low to high, as it is for the corresponding section in Alternative 3. The text describes low intensity effects of traffic on the road (outside the 1/2 mile buffer zone) and the potential for major disturbance of birds using coastal lagoons primarily due to all-terrain vehicle use and increased hunting in previously inaccessible areas. Alternative 2 is likely to result in more indirect disturbance at Kinzarof Lagoon than at Izembek Lagoon based on distance but both lagoons would have improved access under either Alternative 2 or 3 and both lagoons are important to migrating and overwintering waterfowl. The Service believes all-terrain vehicle use in the refuge would be inevitable even with chain barriers along the road and that access by all-terrain vehicles and by pedestrians would increase over time as trails became established and people learned about the availability of wildlife resources in the area. It is not possible to quantify how many people would venture off the road or where they would go at this time, even with barriers installed along the road corridor.</p>
BIO WILD 29	<p>The Service should revise and clarify the discussion of Alternatives 2 and Alternative 3 on Black Brant specifically:</p>	<p>See response to each of the sub-components of this statement of concern.</p>
	<ul style="list-style-type: none"> <li>• In the context of climate change revise the discussion to include an analysis of human disturbance, degradation of habitat, and a resulting decreased nutritional intake by Black Brant using Izembek would have major cumulative impacts on the entire Black Brant population.</li> </ul>	<p>Comments have suggested several references dealing with the effects of climate change on Brant and other birds. Some of these references were cited in Section 3.2.4.2 in the Draft EIS and have been added to the Final EIS (Sections 4.3.2.4 and by reference).</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The estimated adverse effects on the Tundra Swans, Brant, and Emperor Goose in Alternatives 2 and 3 may be overstated. Consideration needs to be given to the wildlife observations of the native people of this region who are more familiar with the migrating patterns and behaviors of the animals who are vested in insuring these resources thrive as their people have been relying on them for thousands of years for survival. The addition of Kinzarof Lagoon to the Izembek State Game Refuge would ensure that 4,282 acres of state waters and submerged land with 2,300 acres of eel grass habitat with 17 miles of intertidal shoreline will have a major positive benefit to the staging and wintering habitat of Emperor Goose and Brant. Additionally islands in the mouth of Kinzarof Lagoon will have a major positive benefit to the staging and wintering habitat of Emperor Goose and Brant.</li> </ul>	<p>The Service respects the lifestyles and knowledge of the local people but also has a legal responsibility to conserve the natural resources in Izembek National Wildlife Refuge. See responses for BIO WILD 11 concerning Tundra Swan habitat in the various land parcels. The addition of the Kinzarof Lagoon to the Izembek State Game Refuge would provide greater protection for tidelands and submerged lands, including eelgrass beds, and marine water that provide habitat for Steller's eiders, emperor geese and other waterbirds; harbor seals; and various species of fish. The Alaska Department of Fish and Game would use the Izembek State Game Refuge Management Plan to manage land use activities in the lagoon, including a requirement for a Special Area Permit for any activity that may damage refuge resources, disturb wildlife or disrupt existing public uses Management of species harvest would be unaffected by the change in land status from general state land to refuge land. However, the Izembek State Game Refuge plans states that the Alaska Department of Fish and Game will work with the Department of Natural Resources to prepare mineral leasehold location orders for the Izembek State Game Refuge, and also recommend that the Department of Natural Resources not offer offshore prospecting permits or leases within the refuge. The departments will recommend that the legislature close the refuge to new locatable mineral entry, mineral prospecting, and mineral leasing under AS 38.05.185-38.05.300.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 30	The Service needs to clarify that if no hovercraft operation means any effect on birds, but why would a hypothetical operation which is as noisy as an airplane has only a minor effect on birds? The completion of the King Cove Access Project access road is not a subject of this EIS and any effect on birds or any other resource must be eliminated. However, the transfer of 5,430 acres with unique Tundra Swan habitat would have a negative effect since these habitats could be subject to future development that are not permissible on land maintaining its wilderness status under Alternatives 2 and 3 [Draft EIS, Page 2-60 Birds/Cumulative Effects Alternative 1].	This comment cites the summary table in Chapter 2. A more complete discussion of this issue can be found in Chapter 4, Section 4.2.2.4. The Chapter 4 assessment of Alternative 1 has been changed because of the Aleutians East Borough's decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation. Resource benefits resulting from the relinquished parcel cannot be claimed without a detailed comparison of the specific values of the alternative lands that would be selected. No edits have been made in response to this specific comment.
BIO WILD 31	The Service should clarify the discussion regarding brown bears, specifically:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>• Subtitle E will add about 57,030 acres of important bear habitats (43,930 acres of spring, summer, fall high density use, 12,100 acres of medium density use, and 1,000 acres of high density denning habitat) that will be added to the National Wildlife Refuge System. Approximately 49,700 acres of key Brown Bear habitat will be located on land that becomes, or is retained as, part of the National Wilderness Preservation System.</li> </ul>	Although the proposed lands to be added to the National Wildlife Refuge System, as wilderness, contain brown bear habitat, the proposed action does not increase existing brown bear habitat and does not preclude potential brown bear disturbing development activities (oil and gas development, etc.) on submerged inholdings to be retained by the State. No edits were made in response to this comment.
	<ul style="list-style-type: none"> <li>• The Final EIS should delete the conclusion or provide the context for the assumed increase in number of brown bears harvested or whether the projected increased harvest is a re-distribution of hunters vs. an increase in the total number of hunters pursuing Brown Bear in the National Wildlife Refuge System, King Cove Corporation private land, and state land.</li> </ul>	Revisions have been made in Section 4.3.2.5 to describe that harvest could increase for several reasons but that Alaska Department of Fish and Game would manage the population

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Revisions to the impact evaluations should include summary comments in Table 22 Summary Comparison of Acres of Brown Bear High, Medium, and Low Density Spring, Summer, and Fall Use and High Density Denning Added or Removed from the National Wildlife Refuge System and the National Wilderness Preservation System under Subtitle E [See King Cove Comments].</li> </ul>	No edits made in response to this comment. See the response to bullet 1 above.
	<ul style="list-style-type: none"> <li>• Revisions to the impact evaluations should include summary comments in Table 23. Summary Net Gain or Loss of Acres of Brown Bear High, Medium, and Low Density Spring, Summer, and Fall Use and High Density Denning Added or Removed from the National Wildlife Refuge System and the National Wilderness Preservation System under Subtitle E [See King Cove Comments].</li> </ul>	No edits made in response to this comment. See the response to bullet 1 above.
	<ul style="list-style-type: none"> <li>• An estimate of the level of expected increased brown bear hunting activity along the road corridor would help greatly in interpreting the level of effects. The impact assessment also could be improved by estimating, at least roughly, the number of bears that could be affected by construction and use of the proposed road. The possible impacts of increased mortality from hunting pressure should be addressed specifically in the EIS. The listings of major effects overall for brown bears in the isthmus area, but moderate effects overall in the larger project area are in accordance with the Draft EIS guidance on deriving summary impact levels from impact criteria [Draft EIS p. 4-4]. The brown bear impact assessment also appropriately addresses impacts both at the local (isthmus) and regional (project area) scales. The impact assessment, however, does not acknowledge the additional brown bear habitat that would receive additional protection when added to the two refuges by the proposed land exchange [Draft EIS p. 4-157, first paragraph]</li> </ul>	See responses to bullets 1 and 2 above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The proposed road would cut through important habitat and wetlands that are used almost daily by foraging brown bears moving from one lagoon to the other during tide cycles. The tide movements provide food sources for bears on both sides of the isthmus. This could eventually displace the bears and reduce the areas carrying capacity.</li> </ul>	The Service agrees. Revisions have been made to Sections 4.3.2.5 in response to this comment.
	<ul style="list-style-type: none"> <li>How can conveyance of 5,000 acres of high quality bear habitat and 400 acres of high density bear denning habitat be negligible to minor and 201 acres exchange to the State of Alaska represents a major impact? [Draft EIS Page 4- 33].</li> </ul>	The 5,000 acres of high quality bear habitat and the 400 acres of high density bear denning habitat already exist. No planned activities that would degrade those habitats have been identified, which may be precluded by a land trade. While the 201 acres exchanged to the State for road construction would directly impact bears from habitat loss and increased disturbance beyond the 201 acres.
BIO WILD 32	The Service should clarify the discussion regarding wolves, specifically:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>The wolf impact assessment could be improved, however, by (1) estimating, at least roughly, the number of animals that could be affected; and (2) specifically addressing impacts both at the local (isthmus) and regional (project area) scales as was done in the brown bear impact assessment [Draft EIS p. 4-157, third paragraph].</li> </ul>	Revisions have been made to Sections 4.3.2.5 to clarify the effect on wolf numbers. Separate assessments for local and regional scales were not made because of the large home range used by wolves.
	<ul style="list-style-type: none"> <li>The Draft EIS states, “Currently, the Alaska Department of Fish and Game reports that relatively little wolf hunting occurs in the project area.” Suggested replacement text: Currently, the Alaska Department of Fish and Game reports that little wolf hunting occurs in the project area [Draft EIS Chapter 4, Page 4-156, Sec. 4.3.2.5, Paragraph 4].</li> </ul>	The suggested edit has been made.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Correct the number of wolves removed in 2009. The Draft EIS states, “For example, the Joshua Green River region was established as a Controlled Use Area in 1993 to protect brown bears, and the Alaska Department of Fish and Game killed 28 wolves on caribou calving grounds adjacent to the refuge in 2008, 6 wolves in 2009, and 2 in 2010 to protect caribou.” Suggested replacement text: For example, the Joshua Green River region was established as a Controlled Use Area in 1993 to protect brown bears, and the Alaska Department of Fish and Game killed 28 wolves on caribou calving grounds adjacent to the refuge in 2008, 8 wolves in 2009, and 2 in 2010 to improve caribou calf survival and recruitment [Draft EIS Chapter 4, Page 4-157, Sec. 4.3.2.5, Paragraph 6].</li> </ul>	<p>The suggested edit has been made.</p>
<p>BIO WILD 33</p>	<p>While there would likely be some impact to Brant and Emperor Goose, the information presented in the Draft EIS is insufficient to support a prediction that operation and maintenance of Alternative 2 would result in a major direct and indirect effects to Brant and Emperor Goose. The Draft EIS indicates that a ½ -mile buffer is necessary to minimize disturbance to waterfowl using intertidal areas. While there may be increased hunting or other human activity from improved access, there is little information suggesting such an increase would result in a major effect. Recommend including information on the number of hunters and other users expected to access Kinzarof Lagoon from the road to be used in predicting potential adverse indirect impacts to Brant and Emperor Goose. In addition, any information on disturbance to Brant and Emperor Goose from operations and maintenance on existing roads adjacent to Izembek Lagoon may be useful in predicting potential adverse effects [Draft EIS Chapter 4, Page 4-145, Sec. 4.3.2.4, Paragraph 2].</p>	<p>The Service bases its assumption that any new road through the Izembek isthmus would be used as a starting point for new all-terrain vehicle trails and other associated human activities on the history of all-terrain vehicle use from the new road to the hovercraft site (Sowl 2008c and 2011f). Barriers are easily circumvented and the Service considers the likelihood of off-road incursions to be probable and that access by all-terrain vehicles and by pedestrians would increase over time as trails became established and people learned about the availability of wildlife resources in the area. It is not possible to quantify how many people would venture off the road or where they would go at this time.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 34	The Service should reconsider their analysis of the following:	See response to BIO WILD 33.
	<ul style="list-style-type: none"> <li>The use of all-terrain vehicles from the proposed road would be prohibited and there would be cable or bollard barriers to emphasize that restriction. In the analysis, the Service implicitly assumes that all-terrain vehicles would be widely used from the proposed road despite the motorized vehicle restrictions. The basis for making that assumption is not provided and should be clearly stated [Draft EIS p. 4-135, last paragraph].</li> </ul>	See response to BIO WILD 33
	<ul style="list-style-type: none"> <li>There is no attempt to quantify the likelihood and magnitude of increased access to Kinzarof Lagoon. A quantitative or qualitative evaluation of the likelihood and magnitude of increased access to Kinzarof Lagoon, however rough, needs to be conducted before the potential for increased access can be considered high or low. [Draft EIS p. 4-135, last paragraph].</li> </ul>	See response to BIO WILD 33
	<ul style="list-style-type: none"> <li>There is no attempt to quantify the indirect effects of increased disturbance and subsistence harvest from increased human access to Kinzarof Lagoon. It is not sufficient to classify those indirect effects as "substantial" or to "consider that they could be much larger than the direct effects" of traffic on the road, without an objective evaluation of the expected level of those effects. [Draft EIS p. 4-135, last paragraph].</li> </ul>	See response to BIO WILD 33

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 35	<p>This is an appropriate geographic categorization of the impacts from the proposed road because it specifically addresses the two primary spatial scales (local and regional) that need to be considered when evaluating summary impacts. This approach, however, was not followed in the subsequent impact assessments for specific bird species and species groups [Draft EIS p. 4-136, first paragraph].</p>	<p>The bird sections of Chapter 4 used groups of birds with similar susceptibilities to various types of direct, indirect, and cumulative effects to analyze the potential environmental consequences of the alternatives. The focus was on the species which were most susceptible to the primary types of effects (e.g., Tundra Swans and disturbance during the nesting season). The same depth of analysis was not conducted for every species in the analysis groups as this would have been repetitive and would not have provided any more useful information for decision-makers. The effects analysis is similar for all species within a group although the impact levels are often less than the impacts on species which were the focus of the analysis. Any mitigation measures designed to protect the focus species would also be effective to some degree in protecting other species in the group.</p>
BIO WILD 36	<p>Without some quantitative evaluation or qualitative categorization of the level of possible unauthorized access within the project area, the effects of increased disturbance and mortality to birds are difficult to predict. The Draft EIS does not provide evidence or justification for the predicted magnitude of impacts to birds from unauthorized access [Draft EIS p. 4-137, first paragraph].</p>	<p>See responses to BIO WILD 12 and 33.</p>

SOC Code	Statement of Concern (SOC)	Response
<p>BIO WILD 37</p>	<p>The Service has determined that the effects of construction on Tundra Swans and other breeding birds would be of medium to high intensity without an estimate of how many birds of each species could be affected and without a consideration of how the effects would be manifested at both local and regional scales (only the local scale was considered). The impact assessment could be improved by (1) estimating, at least roughly, the number of birds that could be affected; and (2) assessing the effects at both a local and regional scale. Related to the second point above, this analysis considers that the summary impacts on Tundra Swans would be major despite the fact that the effects would be local or limited in geographic extent.</p> <p>This is a case in which the Service has assigned a summary impact level (major) that is not in accordance with the Draft EIS guidance on deriving summary impact levels from impact criteria; on Draft EIS p. 4-4, the definition for major impacts states that: “Impacts are generally medium or high intensity, long-term or permanent in duration, a regional or extended scope [emphasis added], and affect important or unique resources.” [Draft EIS p. 4-138, last paragraph].</p>	<p>Predicting the numbers of birds that may be affected with any degree of certainty is problematic due to several factors that are not readily qualified nor quantified, including: (1) a wide variety of species, each with individual disturbance tolerances that may vary seasonally and upon individual or collective energy reserves, or when placed together in mixed-species flocks; (2) topography and weather conditions that influence sound intensity at differing wind speeds, air densities, and road conditions; and, (3) vehicle types, loads, and traffic flows each with a unique range of visual cues and threats to observing wildlife (Trombulak and Frissell 2000; Transportation Research Board 2002; White and Ernst 2003; ABR 2010). Compounding the intended design uses of the road are road-associated increases in human access and other human-related disturbances beyond the vehicle barrier in the “road effect zone” (Forman et al. 1997). The impact criteria provide guidelines for authors to help determine impact levels under different circumstances but they are not rigid rules. In the case of Tundra Swans, the unique status of the resident Izembek population of swans means that local effects also have a regional effect since the population is so geographically restricted. In this context, the Service considers the potential indirect effects of the road alternatives to be major effects. Several revisions have been made to Sections 4.3.2.4 and 4.4.2.4, citing additional references provided. However, the resulting effects determination for Tundra Swans and other breeding birds remains as major.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 38	Although unauthorized all-terrain vehicle and foot traffic could become substantial over time, there has been no attempt to quantitatively or qualitatively estimate, at least roughly, what the level of possible unauthorized access in the project area could be [Draft EIS p. 4-139, first paragraph].	Existing unauthorized all-terrain vehicle access, which has been cited in other sections of the Draft EIS, has been included in this section to support the assumption that this additional user access would occur from the proposed road corridor and result in disturbances that could cause nest abandonment, etc. (qualitative). Quantitative estimates of all-terrain vehicle use and foot traffic on or near the proposed road would be speculative. See also the response to BIO WILD 33.
BIO WILD 39	While the construction and use of the proposed road, along with increased access to areas outside the road corridor, could result in reductions in bird densities in an area larger than the project footprint. However, no attempt has been made to quantify how large an area could be affected outside the road footprint and then to evaluate that effect at both local and regional scales to obtain a more complete picture of the probable impact [Draft EIS p. 4-140, second paragraph].	See response to BIO WILD 33 and 37.
BIO WILD 40	The Service has determined that the effects of the proposed road on Tundra Swans and other breeding birds would be of medium to high intensity without any consideration of how many birds of each species could be affected and without a consideration of how the effects would be manifested at both local and regional scales (only the local scale was considered). Additionally, this analysis considers that the summary impacts on Tundra Swans would be major despite the fact that the effects would be local or limited in geographic extent [Draft EIS p. 4-140, fourth paragraph].	See responses to BIO WILD 11, 12, and 37.

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 41	<p>The Service has determined that the effects of the proposed road on Tundra Swans and other breeding birds would be of medium to high intensity without any consideration of how many birds of each species could be affected and without a consideration of how the effects would be manifested at both local and regional scales (only the local scale was considered). Additionally, this analysis considers that the summary impacts on Tundra Swans would be major despite the fact that the effects would be local or limited in geographic extent. [Draft EIS p. 4-142, first paragraph].</p>	<p>See responses to BIO WILD 11, 12, and 37.</p>
BIO WILD 42	<p>The combination of low intensity impacts with a local geographic extent could also reasonably be categorized as a minor-level impact overall (instead of moderate). Granted the impacts range from temporary in duration (behavioral disturbance) to permanent (habitat loss), but as noted on Draft EIS p. 4-143: “The loss of 107 acres of foraging habitat would have a minor effect due to the abundance of adjacent similar habitat.” It is not clear how low-intensity impacts at a local scale, which are temporary in duration and would entail a minor effect from habitat loss, can be classified as moderate impacts overall. More explanation is needed to support the treatment of these lower-level impact components as moderate overall (which was done for unique, important, and common bird species alike) [Draft EIS p. 4-143, third paragraph].</p>	<p>The Service disagrees with the comment. The referenced paragraph refers to the direct and indirect effects of road construction, and the comment is correct in that the impact assessment indicates a moderate effect for these species.</p> <p>New road construction has the greatest effect for both direct and indirect impacts to wildlife. The edges of the proposed road alignments are currently a national wildlife refuge and designated wilderness. Thus, impacts from the proposed alignments would affect congressionally designated areas and the resources for which they were established. The level of impacts would depend on their significance for biotic communities, populations, species relationships, etc. Further, the proposed road would cut through an area with globally-recognized biological importance as an avian molting, staging, breeding and feeding site for multiple species and has little history of anthropogenic disturbances. Therefore, moderate impact assessments are not unreasonable.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 43	<p>No quantitative or qualitative evaluation was made of the possible magnitude of the effects, which may occur due to increased access to bird habitats along the proposed road corridor and outside of it from unauthorized access to refuge lands. Because these indirect effects play a prominent role in assessing the summary impact levels for Brant and Emperor Goose in particular, it will be important to make at least a qualitative estimate of the levels of these effects in the EIS. If the impact criteria are a guide, it could be concluded that these indirect effects are considered to be low in intensity because the overall conclusions for impacts to Brant, Emperor Goose, and other migrating/wintering birds list low-intensity impacts. However, the impact components listed in Draft EIS Table 4.1-2 on p. 4-6 only indicate effects for behavioral disturbance and habitat alterations (there are no impact component definitions listed for mortality from increased hunting pressure, for example). For greater clarity, the possible impacts of increased disturbance and mortality from hunting pressure should be addressed specifically in the EIS for all wildlife species [Draft EIS p. 4-143, sixth paragraph].</p>	<p>As described in the response to BIO WILD 37, quantitative estimates of the number of birds potentially disturbed under the various alternatives are not feasible. The extent and frequency of off-road travel and associated human activities are uncertain but the Service considers such incursions into refuge lands to be inevitable and likely to increase over time. The EIS makes qualitative assessments of impacts, as suggested in the comment, and concluded that the intensity of disturbance could be major for some species, based primarily on disturbance from hunting in areas that are currently very difficult to access and serve as refuges for large concentrations of waterfowl. The comment is correct that the effects of mortality from increased hunting pressure are not part of the effects criteria for biological resources. No edits have been made in response to this comment.</p>
BIO WILD 44	<p>The construction and use of the proposed road could result in reductions in bird densities in an area larger than the project footprint, but no attempt has been to quantify how large an area could be affected outside the road footprint and then to evaluate that effect at both local and regional scales to obtain a more complete picture of the probable impact [Draft EIS p. 4-144, third paragraph].</p>	<p>The EIS acknowledges that the potential effects on birds would extend well beyond the footprint of the road. As described in the response to BIO WILD 37, quantitative estimates of the number of birds potentially affected under the various alternatives are not feasible. The EIS does evaluate the potential effects on various species from a regional perspective and the local perspective, both in the direct and indirect effects analysis and the cumulative effects analysis. No additional edits have been made in response to this comment.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 45	<p>It would be beneficial to define what is meant by “major disturbances” [Draft EIS p. 4-144 to 145]. Does major mean many birds could be displaced or that small numbers could be repeatedly disturbed? Some quantification or categorization of the possible effects envisioned here, in terms of the estimated numbers of birds involved and the possible timeframes, is warranted; it is not sufficient to simply state that the disturbances could be major. Additionally, the word major is a loaded modifier to use in this context given that the largest summary impacts for all resources are also termed major in the Draft EIS.</p>	<p>The comment is correct that "major disturbance" has not been defined and that "major" is an inappropriate modifier in this context. The text has been edited to reflect low to high intensity of disturbance effects, involving the potential for both high numbers of birds disturbed at any one time and a high number of repeated disturbances for individuals, especially during the fall hunting season.</p>
BIO WILD 46	<p>The Draft EIS determined that the effects of road operation and maintenance on Brant and Emperor Goose would result in major overall, summary impacts despite the fact that the impact criteria indicated effects of low intensity that were local in geographic extent. Note also that the definition of low intensity impacts for behavioral disturbance [Draft EIS p. 4-6, Table 4.1-2] states that: “Changes in behavior due to project activity may not be noticeable; animals remain in the vicinity.” It is unclear how the Draft EIS interprets impacts of this magnitude as major at the summary level. Because concerns about increases in mortality from unauthorized access and increased hunting pressure play an important role in this impact assessment, those concerns should be addressed specifically with a quantitative or qualitative categorization of the possible increase in mortality effects. The impact assessment for Brant and Emperor Goose represents another case in which the Draft EIS has assigned a summary impact level (major) that is not in accordance with the Draft EIS guidance on deriving summary impact levels from impact criteria; on Draft EIS p. 4-4, the definition for major impacts states that: “Impacts are generally medium or high intensity, long-term or permanent in duration, a regional or extended</p>	<p>As noted elsewhere, actual road construction and operation may only be a minor disturbance to wildlife, rather, it is the combined and cumulative effects that increase the significance of the impacts to such a point that it may impact habitat, behavior, or reproductive success of selected species. Chief among these is the increased human access to an area that has not previously been accessible, at least not without great difficulty. This cannot be quantified for this specific area as any attempt would be speculative and without merit. However, there is adequate documentation in peer-reviewed literature to demonstrate what can and most likely would occur to sensitive wildlife with increase human access, specifically hunting pressure and intrusion into areas that are essential to the survival of populations. Salient examples from the available literature have been provided in the EIS and associated evaluations, including this comment analysis. Additional time and effort would only add to this library of documentation. Lack of site-specific, quantifiable projections for the future does not diminish the established mechanisms for predicting adverse effects.</p>

SOC Code	Statement of Concern (SOC)	Response
	<p>scope, and affect important or unique resources.”            Additionally, the impacts have been assessed without an estimate of how many birds of each species could be affected and without a consideration of how the effects would be manifested at both local and regional scales (only the local scale was considered). Here again, the impact assessment should be improved by (1) estimating, at least roughly, the number of birds that could be affected; and (2) assessing the effects at both a local and regional scale. [Draft EIS p. 4-146, third paragraph].</p>	
<p>BIO WILD 47</p>	<p>The information presented in the Draft EIS is insufficient to support a prediction that construction of Alternative 2 would result in a major impact to Tundra Swans. The Draft EIS states, “Construction of Alternative 2 would result in major direct and indirect effects to Tundra Swans and moderate effects to other breeding birds.” Recommend including data on the average number of breeding pairs historically found in the project area (both from the resident population in Izembek National Wildlife Refuge and non-resident migrants), and estimates of the local swan population and number of non-resident swans migrating through the refuge to be used in predicting potential adverse direct and indirect effects to Tundra swans. In addition, include information describing whether swan nesting habitat is limited in the refuge [Draft EIS Chapter 4, Page 4-140, Sec. 4.3.2.4, Paragraph 4 and also see Chapter 4, page 4-138 Sec 4.3.2.4, paragraph 4. For Tundra Swans].</p>	<p>Additional information on the density and distribution of Tundra Swans in the Izembek National Wildlife Refuge and other parcels of land potentially involved in a land exchange has been incorporated into the swan sections of the Final EIS. This new information has been evaluated as one of the criteria for the impact assessment, as suggested in the comment.</p>

SOC Code	Statement of Concern (SOC)	Response
BIO WILD 48	<p>While the summary impact of Alternative 2 on Brant, Emperor Goose, and other migrating/wintering birds is considered major (Brant and Emperor Goose) to moderate (other species) the information presented in the Draft EIS is insufficient to support a prediction that operation and maintenance of Alternative 2 would result in a major direct and indirect effects to Brant and emperor geese. The Draft EIS indicates that a ½ -mile buffer is necessary to minimize disturbance to waterfowl using intertidal areas. While there may be increased hunting or other human activity from improved access, there is little information suggesting such an increase would result in a major effect. The Draft EIS states, “Operation and maintenance of Alternative 2 would result in major (Brant and Emperor Goose) and moderate (other species) direct and indirect effects to these resources.” Recommend including information on the number of hunters and other users expected to access Kinzarof Lagoon from the road to be used in predicting potential adverse indirect impacts to Brant and Emperor Goose. In addition, any information on disturbance to Brant and Emperor Goose from operations and maintenance on existing roads adjacent to Izembek Lagoon may be useful in predicting potential adverse effects [Draft EIS Chapter 4, Page 4-146, Sec. 4.3.2.4, Paragraph 3 and Chapter 4, page 4-145 Sec. 4.3.2.4, paragraph 2].</p>	<p>The Service considers there to be a high probability of increased hunting in the refuge and surrounding areas due to improved access with any new road construction. However, estimating how many or how often or exactly where such hunting incursions would take place would be speculative. The Service believes that the very large numbers of staging and resident waterfowl could be disturbed by very few hunters and that repeated disturbances, such as could result from several hunters spread out in a waterfowl concentration area, could affect the ability of many birds to prepare energetically for migration or wintering. The location, distribution, frequency, and timing of hunting disturbance is probably more important to overall impacts than the actual number of hunters involved.</p>

## Cooperating Agencies (COOP)

SOC Code	Statement of Concern (SOC)	Response
COOP	Comments on adequacy of consultation with cooperating agencies.	Category Code; no response required.
COOP 01	Concern was expressed that the cooperating agencies were not adequately consulted not given an opportunity to review all of the impact evaluations. It is felt that late unilateral changes by the Service have a direct and biased effect on the information presented to the public in this Draft EIS, notably when the rating of impacts to Tundra Swans was elevated from a "moderate" to a "major" impact without sufficient information to justify this change.	There are seven formal cooperators assisting the Service in preparing this EIS: the Agdaagux Tribe of King Cove (a federally recognized tribal government), Native Village of Belkofski (a federally recognized tribal government), State of Alaska, City of King Cove, Aleutians East Borough, King Cove Corporation, U.S. Army Corps of Engineers, and Federal Highway Administration, Western Federal Lands. All cooperating agencies signed memoranda of understanding with the Service that clearly indicated the roles and responsibilities of the cooperating agencies and the lead agencies. Each Memorandum of Understanding clearly indicates that the Service "reserves the right to make the final decisions regarding the content of the EIS documents." Each cooperating agency also agreed to "recognize the Service has the ultimate responsibility for the content and preparation of the EIS." The Service provided each cooperating agency an "internal review draft" of the Draft EIS at the same time providing copies of the "internal review draft" to various Service staff members including several wildlife biologists with detailed knowledge of the project area and key wildlife species that inhabit the area. Hundreds of comments were received from cooperators and staff on the "internal review draft" Lead Service staff worked with their third party EIS contractor to address all the comments received on the "internal review draft" and to finalize the Draft EIS for public review. Many of the comments conflicted with each other; especially comments about the environmental consequences.

SOC Code	Statement of Concern (SOC)	Response
		<p>For the tundra swan analysis, several Service biologists familiar with the area and tundra swans commented that the "internal review draft" did not sufficiently display the cumulative effects and that the summary impact should be major vs. moderate; while a cooperator comment on the same impact analysis said the summary rating should be minor rather than moderate. Service staff convened a meeting of biologists (from the Service and URS, the third party contractor) familiar with the project area and the literature and facilitated a detailed discussion of the comments to determine if there were scientific disagreements among the experts. Upon conclusion of these discussions, changes were made to some of the impact ratings in the Draft EIS based on the best professional judgment of the team considering all available biological information. There were no substantive areas of disagreement among this group. Notes were kept from this meeting and provided to all the cooperators and this information is in the administrative record for this EIS.</p>
COOP 02	<p>The Service should more fully explain the limitations of this EIS analysis in relation to the permitting requirements of the U.S. Army Corps of Engineers, a cooperating agency in the EIS [Draft EIS Section 1.5, paragraph 7]. The Draft EIS does not provide a formal wetlands delineation and the Corps may be required to conduct additional National Environmental Policy Act (NEPA) compliance analysis in order to fulfill its permitting responsibilities.</p>	<p>We understand that the Corps has different obligations under the National Environmental Policy Act than the Service relating to the Izembek EIS. Specifically, the Service must make a recommendation about a land exchange for the purposes of constructing a road. Should the land exchange be approved and lands conveyed to the State of Alaska, the Corps would address an application for a permit under Section 404 of the Clean Waters Act (Section 404 permit) for the construction of a road. The Corps did request that wetland delineation be completed for the Final EIS which meets the needs of the Corps to consider a Section 404 permit. While it would be desirable for this EIS to meet the needs of a possible Section 404 permit applicant, even the Council on Environmental Quality regulations which encourage preparation of fully comprehensive EISs, recognize that is not</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>always possible (40 CFR 1502.25 and 40 CFR 1508.28). The Service has completed a wetland analysis that fully meets its purposes in determining what wetlands may be impacted if the land exchange is approved and a road constructed. The U.S. Fish and Wildlife Service is responsible for the final EIS and the Record of Decision. Should the land exchange be approved, then the State of Alaska would become owner of the road corridor lands and presumably would be the applicant for a Section 404 permit to construct the road. We recognize that the Corps may need additional environmental analysis to evaluate a Section 404 permit. It would be the responsibility of the applicant to provide whatever additional information is necessary for the Section 404 permit that was not included in this EIS. As explained elsewhere, detailed wetland delineations sufficient to make decisions regarding a Section 404 permit application are not necessary for the lead agency to make a decision regarding exchange of lands.</p>
COOP 03	<p>The Service needs to consider the comments the King Cove Group provided on December 23, 2011 that are not reflected in the Draft EIS. The King Cove Group comments on the Preliminary Draft EIS should also be incorporated as the Final EIS is prepared.</p>	<p>The Service provided a comment response tracking spreadsheet with comments from all cooperators with a response as to the disposition of the comment on March 19, 2012 for the Preliminary Draft EIS. As noted in the Service response, some comments were accepted and the Draft EIS was revised to reflect those changes. Other comments were not accepted and no changes were made in the document. We consider analysis of and response to comments on the Preliminary Draft EIS phase to be concluded and we are focusing our attention on the responses to public comments on the Draft EIS.</p>

## Data and Available Information (DATA)

SOC Code	Statement of Concern (SOC)	Response
DATA	Recommended studies and reports for the Service to review for inclusion in the EIS.	Category Code; no response required.
DATA 01	The Service should review the benefit-cost analysis prepared by The Wilderness Society and the Center for Sustainable Economy:	The Service has reviewed the benefit-cost analysis prepared by the Wilderness Society. The components of an EIS are described in Part 1502 of the National Environmental Policy Act Section 1502.23 concerns cost-benefit analyses: For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations. The EIS does inventory social and cost considerations, and estimates the impacts of each alternative. It should be noted that the EIS' primary focus is to evaluate the impacts of a land exchange in accordance with Omnibus Public Land Management Act of 2009 (Act) (Public Law 111-11, Title VI, Subtitle E).
	<ul style="list-style-type: none"> <li>• Reports preliminary conclusions based on the analysis of these two organizations with respect to net public benefits, the benefit-cost ratio, and the project's public interest determination.</li> </ul>	See response above.
DATA 02	The Service should consider these additional references regarding the impact of roads on large carnivores and bears:	The suggested references have been reviewed; some were already cited in Chapter 4. The following new references contained relevant information that we added to the revised impact analysis in Chapter 4. Vors and Boyce 2009, Mattson 1990, McLellan and Shackleton 1989, Noss et al 1996, Titus and Beier 1991, Schoen 1994.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[road impacts on bears] Mace, R., et al., Relationships among grizzly bears, roads and habitat in the Swan Mountains, Montana, 33 JOURNAL OF APPLIED ECOLOGY 1395-1405 (1996).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[road impacts on bears] Mattson, D., Human impacts on bear habitat use, 8 INTERNATIONAL CONFERENCE ON BEAR RESEARCH AND MANAGEMENT 33-56 (1990).</li> </ul>	See response to BIO WILD 33.
	<ul style="list-style-type: none"> <li>[road impacts on bears] McLellan, B. and D. Shackleton, Immediate reactions of grizzly bears to human activities, 17 WILDLIFE SOCIETY BULLETIN 269-275 (1989).</li> </ul>	See response to BIO WILD 33.
	<ul style="list-style-type: none"> <li>[road impacts on bears] McLellan, B., Relationships between human industrial activity and grizzly bears, 8 INTERNATIONAL CONFERENCE ON BEAR RESEARCH AND MANAGEMENT 57-64 (1990).</li> </ul>	See response to BIO WILD 33.
	<ul style="list-style-type: none"> <li>[road impacts on large carnivores] Noss, R., et al., Conservation biology and carnivore conservation in the Rocky Mountains, 10 CONSERVATION BIOLOGY 949-963 (1996).</li> </ul>	See response to BIO WILD 33.
	<ul style="list-style-type: none"> <li>[road impacts on bears] Schoen, J., et al., Habitat-capability model for brown bear in Southeast Alaska, 9 INTERNATIONAL CONFERENCE ON BEAR RESEARCH AND MANAGEMENT 327-337 (1994).</li> </ul>	See response to BIO WILD 33.
	<ul style="list-style-type: none"> <li>[roads and bears] Suring, L., and G. Del Frate, Spatial analysis of locations of brown bears killed in defense of life or property on the Kenai Peninsula, Alaska, USA, 13 URSUS 237-245 (2002).</li> </ul>	See response to BIO WILD 33.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[roads and bears] Titus, K., and L. Beier, Population and habitat ecology of brown bears on Admiralty and Chichagof islands, Federal Aid in Wildlife Restoration, Research Progress Report W-23-4, Alaska Department of Fish and Game, Juneau, AK (1991).</li> </ul>	See response to BIO WILD 33.
	<ul style="list-style-type: none"> <li>[road impacts on large carnivores] Trombulak, S., and C. Frissell, Review of ecological effects of roads on terrestrial and aquatic communities, 14 CONSERVATION BIOLOGY 18-30 (1999).</li> </ul>	See response to BIO WILD 33.
DATA 03	The Service should consider these additional references regarding the impact of human disturbance on Black Brant:	Comments have suggested several references dealing with the effects of disturbance on Brant. One of these references was already cited in Section 3.2.4.2 in the Draft EIS, one was irrelevant for Brant at Izembek, and one was added to Section 3.2.4.2 in the Final EIS,.
	<ul style="list-style-type: none"> <li>[impacts from human disturbance, Black Brant] Frid, A. and L. Dill, Human-caused disturbance as a form of predation risk, 6 CONSERVATION ECOLOGY 11(2002).</li> </ul>	This reference makes a conceptual comparison between disturbance and anti-predator responses. It is theoretical in nature but the concept has been added in Section 3.2.4.2.
	<ul style="list-style-type: none"> <li>[impacts from human disturbance, Black Brant] Ward, D.H., R.A. Stehn, and D.V. Derksen, Response of staging brant to disturbance at the Izembek Lagoon, Alaska, 22 WILDLIFE SOCIETY BULLETIN 220-228 (1994).</li> </ul>	This reference was cited in Section 3.2.4.2 of the Draft EIS.
	<ul style="list-style-type: none"> <li>[impacts from human disturbance, Black Brant] Wilson, U.W. and J.R. Atkinson, Black brant and spring-staging use at two Washington coastal areas in relation to eelgrass abundance, 97 CONDOR 91-98 (1995).</li> </ul>	This reference has no information relevant to this analysis and will not be incorporated into the Final EIS.

SOC Code	Statement of Concern (SOC)	Response
DATA 04	The Service should consider this additional data regarding caribou:	The suggested references have been reviewed and cited in the impact assessments in Chapter 4.
	<ul style="list-style-type: none"> <li>• [caribou, human disturbance] Frid, A. and L. Dill, Human-caused disturbance as a form of predation risk, 6 CONSERVATION ECOLOGY 11 (2002).</li> </ul>	The impact of human disturbance on caribou has been appropriately analyzed and assessed. No additional edits have been made in response to this comment.
	<ul style="list-style-type: none"> <li>• More recent information and references for Southern Alaska Peninsula (SAP) population parameters are available (see “SAP Comp 2011.doc”; Memorandum from Meghan Riley to Lem Butler). The Draft EIS states, “The most current population estimate of 800, along with improved calf:cow ratio (46.6 calves:100 cows) and bull:cow ratio (27.9 bulls:100 cows) observed during the fall 2010 survey, demonstrates a recent improvement in calf survival and recruitment in the Southern Alaska Peninsula Caribou Herd since wolf control was initiated in 2008 (see Wolf section below) (Alaska Department of Fish and Game 2010).” Suggested replacement text: “The most current population estimate of <math>\geq 920</math>, along with the improved calf:cow ratio (20.0 calves:100 cows) and bull:cow ratio (40.2 bulls:100 cows) observed during the fall 2011 survey, demonstrate a recent improvement in calf survival and recruitment in the Southern Alaska Peninsula Caribou Herd following implementation of a wolf control program from 2008-2010 (see Wolf section below) (Alaska Department of Fish and Game 2012x).” [Draft EIS Chapter 3, Page 3-154, Sec. 3.2.5, Paragraph 1]</li> </ul>	The suggested references have been reviewed and cited in the impact assessments in Chapter 4.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• More recent information and references for Southern Alaska Peninsula population parameters are available (see “SAP Comp 2011.doc”; Memorandum from Meghan Riley to Lem Butler). The Draft EIS states, “A composition survey was conducted by Alaska Department of Fish and Game biologists on October 20, 2010. The herd was estimated to be comprised of 57.3 percent cows, 26.7 percent calves, and 16.0 percent bulls (Alaska Department of Fish and Game 2010l). The trend from this data (in comparison to prior years) is that the proportion of calves has greatly increased since 2008 when predator control began (Alaska Department of Fish and Game 2010l).” Suggested replacement text: “A composition survey was conducted by Alaska Department of Fish and Game biologists on October 23, 2011. The herd was estimated to be comprised of 62.4 percent cows, 12.5 percent calves, and 25.1 percent bulls (Alaska Department of Fish and Game 2012x). The trend from these data (in comparison to prior years) is that the proportion of calves has greatly increased following implementation of predator control from 2008-2010 (Alaska Department of Fish and Game 2012x).” [Draft EIS Chapter 3, Page 3-155, Sec. 3.2.5, Paragraph 4]</li> </ul>	<p>The suggested references have been reviewed and cited in the impact assessments in Chapter 4.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Rather than using a personal communication, the citation should be updated to reference the 2012 annual program report to the Board of Game (see “Annual Report to the Alaska Board of Game on Intensive Management for Caribou with Wolf Predation Control in the Southern Alaska Peninsula Caribou Herd, Subunit 9D”; available at <a href="http://www.adfg.alaska.gov/index.cfm?adfg=intensivemana gement.programs">http://www.adfg.alaska.gov/index.cfm?adfg=intensivemana gement.programs</a>). The Draft EIS states, “During 2008, Alaska Department of Fish and Game biologists killed 28 wolves on the calving grounds (Figure 3.2-22) from helicopters. Additional wolf control occurred in 2009 (6 wolves killed) and 2010 (2 wolves killed) (Riley 2010a).” Suggested replacement text: “During 2008, Alaska Department of Fish and Game biologists killed 28 wolves on the calving grounds (Figure 3.2-22 [of the Draft EIS]) from helicopters. Additional wolf control occurred in 2009 (8 wolves killed) and 2010 (2 wolves killed) (Alaska Department of Fish and Game 2012x).” [Draft EIS Chapter 3, Page 3-157, Sec. 3.2.5, Paragraph 4]</li> </ul>	<p>The citation for the updated population data has been changed to ADFG 2012 in Section 3.2.5.1.</p>
DATA 05	<p>The Service should consider this additional reference regarding census data:</p>	<p>See response to each of the sub-components of this statement of concern.</p>
	<ul style="list-style-type: none"> <li>• Using socioeconomic data [Draft EIS Page 3-212 Socioeconomics] which are 20 years old has diminished value. 2010 census data for King Cove population, housing units, and group quarters are available and should supersede the data in the Draft EIS.</li> </ul>	<p>Section 3.3.2 Socioeconomics has been updated with 2010 US Census data. Resulting adjustments to Chapter 4 estimates have also been made.</p>

SOC Code	Statement of Concern (SOC)	Response
DATA 06	The Service should consider these additional references regarding the effects of climate change	<p>The type of information included in the report on thresholds for climate change in ecosystems is more suited for resource-specific discussions on impacts from climate change. Due to the low level of climate change impacts estimated from this project, this level of detail for specific resources is not commensurate with the level of impacts and level of certainty in predicting resource-specific impacts from climate change on a project-level.</p> <p>Global Climate Change in the US - Information provided in this document is consistent with what has been presented in the EIS. A sentence regarding ocean acidification and coastal erosion, consistent with this document was added to Section 4.2.1.2.</p>
	<ul style="list-style-type: none"> <li>• [climate change] Fagre, D.B., et al., THRESHOLDS OF CLIMATE CHANGE IN ECOSYSTEMS, A REPORT BY THE U.S. CLIMATE CHANGE SCIENCE PROGRAM AND THE SUBCOMMITTEE ON GLOBAL CHANGE RESEARCH, U.S. Geological Survey, Reston, VA (2009).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• [AK warming, climate change] Karl, T.R., J.M. Melillo, and T.C. Peterson (eds.), GLOBAL CLIMATE CHANGE IMPACTS IN THE UNITED STATES, U.S. Global Change Research Program, Cambridge University Press (2009).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• [climate change, synergistic effects] Przeslawski, R., et al., Synergistic Effects Associated with Climate Change and the Development of Rocky Shore Molluscs, 11 GLOBAL CHANGE BIOLOGY 515-522 (2005).</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[climate change, synergistic effects] Russell, B.D., et al., Synergistic Effects of Climate Change and Local Stressors: CO2 and Nutrient-driven Change in Subtidal Rocky Habitats, 15 GLOBAL CHANGE BIOLOGY 2153-2162 (2009).</li> </ul>	See response above.
DATA 07	The Service should consider these additional references regarding the effects of climate change on Steller's Eider:	One of the references contained valuable information on the habitat use of Steller's Eider in the fall and has been incorporated into the Final EIS in Section 3.2.7.1. The other suggested references did not provide any specific information on the potential impacts of climate change on Steller's Eider or any ecosystem components particular to Izembek National Wildlife Refuge or the surrounding area. These references do not provide any information relevant to the impact analysis on Steller's Eider in the Izembek area and therefore were not incorporated into the Final EIS.
	<ul style="list-style-type: none"> <li>[impacts of climate change to Steller's eider] Dau, C. P., P. L. Flint and M.R. Petersen, Distribution of recoveries of Steller's Eiders banded on the lower Alaska peninsula, Alaska, 71 JOURNAL OF FIELD ORNITHOLOGY 541-548 (2000).</li> </ul>	This document does not have any specific information on the potential impacts of climate change on Steller's Eider but does have valuable information regarding the distribution and movements of eiders. It was cited in the Draft EIS in Section 3.2.7.1.
	<ul style="list-style-type: none"> <li>[impacts of climate change to Steller's Eider] Grebmeier, J. M., et al., A major ecosystem shift in the Northern Bering Sea, 311 SCIENCE 1461-1464 (2006).</li> </ul>	This document does not have any specific information on the potential impacts of climate change on Steller's Eider or any ecosystem component particular to Izembek National Wildlife Refuge or the surrounding area. It is a review of climate change impacts in the northern Bering Sea and has no particular relevance to the decisions discussed in the EIS and therefore has not been incorporated into the Final EIS.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[impacts of climate change to Steller's Eider, molting] Kertell, K., Disappearance of the Steller's eider from the Yukon-Koskokwim Delta, Alaska, 44 ARCTIC 177-187 (1991).</li> </ul>	<p>This document does not have any specific information on the potential impacts of climate change on Steller's Eider or any other information relevant to the impact analysis on Steller's Eider in the Izembek area and therefore has not been incorporated into the Final EIS.</p>
	<ul style="list-style-type: none"> <li>[impacts of climate change to Steller's Eider] Lovvorn, J. R., et al., Modeling marine protected areas for threatened eiders in a climatically changing Bering Sea, 19 ECOLOGICAL APPLICATIONS 1596-1613 (2009).</li> </ul>	<p>This document concerns Spectacled Eiders and efforts to model habitat quality for this species in the northern Bering Sea. It does not provide any information relevant to the impact analysis on Steller's Eider in the Izembek area and therefore has not been incorporated into the Final EIS.</p>
	<ul style="list-style-type: none"> <li>[impacts of climate change to Steller's Eider, molting] Orr, J.C., et al., Anthropogenic ocean acidification over the twenty-first century and its impact on calcifying organisms, 437 NATURE 681-686 (2005).</li> </ul>	<p>This document is a modeling exercise focusing on changes in the Southern Ocean. While the paper discusses the potential effects of climate change and ocean acidification on calcareous marine species, there is no information presented which is specific to effects on Steller's Eider or the Izembek area ecosystem in particular. The potential for climate change to affect Steller's Eider is discussed in the Final EIS but this recommended document does not provide any information relevant to the impact analysis on Steller's Eider in the Izembek area and therefore has not been incorporated into the Final EIS.</p>
	<ul style="list-style-type: none"> <li>[impacts of climate change to Steller's Eider] Pacific Flyway Council, PACIFIC FLYWAY MANAGEMENT PLAN FOR PACIFIC BRANT, Pacific Flyway Study Committee, U.S. Fish and Wildlife Service, Portland, OR (2002).</li> </ul>	<p>This document is cited in the Draft EIS in relation to Black Brant but it does not contain any information on Steller's Eider.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[impacts of climate change to Steller's Eider] Petersen, M.R., Populations, feeding ecology and molt of Steller's Eiders, 83 CONDOR 256-262 (1981).</li> </ul>	<p>This reference does not provide any information on potential climate change effects but does provide important information on the use of Izembek Bay and other areas along the Alaska Peninsula in fall. It has been incorporated into the Final EIS in Section 3.2.7.1.</p>
DATA 08	<p>The Service should consider these additional references regarding the effects of climate change on Black Brant:</p>	<p>Comments have suggested several references dealing with the effects of climate change on Brant and other birds. Some of these references were cited in Section 3.2.4.2 in the Draft EIS, one of which was also added to Section 4.3.2.4. Others were irrelevant for Brant at Izembek National Wildlife Refuge and the surrounding area, and one was added to Section 3.2.4.2 in the Final EIS,</p>
	<ul style="list-style-type: none"> <li>[climate change effects on Black Brant] Fabry, V., et al., Impacts of ocean acidification on marine fauna and ecosystem processes, 65 ICES JOURNAL OF MARINE SCIENCE, 414-32 (2008).</li> </ul>	<p>This document does not have any specific information on the potential impacts of ocean acidification on Brant or any other birds or any ecosystem component particular to Izembek National Wildlife Refuge or the surrounding area. It is a general review of the issue and has no particular relevance to the decisions discussed in the EIS and therefore has not been incorporated into the Final EIS.</p>
	<ul style="list-style-type: none"> <li>[climate change effects on Black Brant] IPCC, CLIMATE CHANGE 2007: SYNTHESIS REPORT, An Assessment of the Intergovernmental Panel on Climate Change, Available at <a href="http://www.ipcc.ch">www.ipcc.ch</a> (2007).</li> </ul>	<p>This document does not have any specific information on the potential impacts of climate change on Brant or any other birds or any ecosystem component particular to Izembek National Wildlife Refuge area. It is a technical review of the issue from the worldwide perspective and has no particular relevance to the decisions discussed in the EIS and therefore has not been incorporated into the Final EIS.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[climate change impacts to Black Brant] Miller, M.W., Route selection to minimize helicopter disturbance of molting Pacific Black Brant: A simulation, 47 ARCTIC 341-349 (1994).</li> </ul>	<p>This reference discusses a modeling exercise to help determine helicopter flight patterns that would minimize disturbance to Brant at Teshekpuk Lake. It has no particular relevance to the decisions discussed in the EIS and therefore has not been incorporated into the Final EIS.</p>
	<ul style="list-style-type: none"> <li>[climate change impacts to Black Brant] Pacific Flyway Council, PACIFIC FLYWAY MANAGEMENT PLAN FOR PACIFIC BRANT, Pacific Flyway Study Committee, U.S. Fish and Wildlife Service, Portland, OR (2002).</li> </ul>	<p>This reference was already cited in Section 3.2.4.2 of the Draft EIS.</p>
	<ul style="list-style-type: none"> <li>[climate change effects on Black Brant] Sedinger, J.S., et al., Carryover effects associated with winter location affect fitness, social status, and population dynamics in a long-distance migrant, AMERICAN NATURALIST, accessed on April 24, 2012 at <a href="http://www.asnamnat.org/node/157?page=1">http://www.asnamnat.org/node/157?page=1</a> (2011).</li> </ul>	<p>This reference was added to Section 3.2.4.2 of the Final EIS.</p>
	<ul style="list-style-type: none"> <li>[climate change effects on Black Brant] Ward, D. H., et al., Change in abundance of Pacific brant wintering in Alaska: evidence of climate warming effect? 62 ARCTIC 301-311 (2009).</li> </ul>	<p>This reference was already cited in Section 3.2.4.2 of the Draft EIS but was also added to Section 4.3.2.4.</p>
	<ul style="list-style-type: none"> <li>[climate change effects on Black Brant] Ward, D.H., et al., North American brant: effects of changes in habitat and climate on population dynamics, 11 GLOBAL CHANGE BIOLOGY 869-880 (2005).</li> </ul>	<p>This reference discusses the same types of information as Ward et al. 2009 and Sedinger et al. 2011 and is superseded by those documents by the same authors.</p>
DATA 09	<p>The Service should consider these additional references regarding the effects of climate change on caribou:</p>	<p>The suggested references have been reviewed and cited in the impact assessments in Chapter 4.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[impacts of climate change to caribou] Post, E., and M. C. Forchhammer, Climate change reduces reproductive success of an Arctic herbivore through trophic mismatch, 363 PHILOSOPHICAL TRANSACTIONS OF THE ROYAL SOCIETY B-BIOLOGICAL SCIENCES 2369-2375 (2008).</li> </ul>	<p>The suggested references have been reviewed and cited in the impact assessments in Chapter 4.</p>
	<ul style="list-style-type: none"> <li>[impacts of climate change to caribou] Vors, L. S., and M. S. Boyce, Global declines of caribou and reindeer, 15 GLOBAL CHANGE BIOLOGY 2626-2633 (2009).</li> </ul>	<p>The suggested references have been reviewed and cited in the impact assessments in Chapter 4.</p>
DATA 10	<p>The Service should consider these additional references regarding the effects of climate change on sea ice:</p>	<p>The sources provide more detail regarding specifics of sea ice extent decline, and findings from additional studies. These sources were consistent with the qualitative statement made in the Draft EIS regarding decline of ice extent. Due to uncertainties and margin of error in these estimates, the discussion in the EIS is more qualitative. Impacts to climate change (which includes effect to sea ice) are estimated by greenhouse gas emissions, since climate change models are not yet accurate enough to determine project-level impacts to sea ice from greenhouse gas emissions.</p>
	<ul style="list-style-type: none"> <li>[sea ice, climate change] Comiso, J. C., et al., Accelerated decline in the Arctic sea ice cover, GEOPHYSICAL RESEARCH LETTERS 35, L01703, doi:10.1029/2007GL031972 (2008).</li> </ul>	<p>See response above.</p>
	<ul style="list-style-type: none"> <li>[sea ice, climate change] Jones, B. M., et al., Increase in the rate and uniformity of coastline erosion in Arctic Alaska, GEOPHYSICAL RESEARCH LETTERS 36, L03503, doi:10.1029/2008GL036205 (2009)</li> </ul>	<p>See response above.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[arctic sea ice, climate change] Lindsay, R. W., et al., Arctic sea ice retreat in 2007 follows thinning trend, 22 JOURNAL OF CLIMATE 22:165-176 (2009).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea ice, climate change] National Snow and Ice Data Center, Weather and feedbacks lead to third-lowest extent, available at <a href="http://nsidc.org/arcticseaicenews/2010/100410.html">http://nsidc.org/arcticseaicenews/2010/100410.html</a> (2010).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea ice, climate change] National Snow and Ice Data Center, Arctic sea ice shatters all previous record lows, Press release, Boulder, CO, available at <a href="http://www.nsidc.org/news/press/2007_seaiceminimum/20071001_pressrelease.html">http://www.nsidc.org/news/press/2007_seaiceminimum/20071001_pressrelease.html</a> (October 1, 2007).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] Richter-Menge, J., et al., Arctic Report Card 2008, <a href="http://www.arctic.noaa.gov/reportcard">http://www.arctic.noaa.gov/reportcard</a> (2008).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[winter sea ice, climate change] Stroeve, J., et al., Arctic sea ice decline: Faster than forecast, GEOPHYSICAL RESEARCH LETTERS 34,L09501, doi: 10.1029/2007GL029703 (2007).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[arctic sea ice, climate change] Stroeve, J., et al., Arctic sea ice extent plummets in 2007, EOS TRANSACTIONS, AGU 89:13-14 (2008).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea ice, climate change] Wang, M., J. E. Overland, and N. A. Bond, Climate projections for selected large marine ecosystems, 79 JOURNAL OF MARINE SYSTEMS 258-266 (2010).</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[arctic sea ice, climate change] Wang, M., and J. E. Overland, A sea ice free summer Arctic within 30 years? JOURNAL OF GEOPHYSICAL RESEARCH 36, L07502, doi:10.1029/2009GL037820 (2009).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[arctic sea ice, climate change] Zhang, X., Sensitivity of arctic summer sea ice coverage to global warming forcing: towards reducing uncertainty in arctic climate change projections, 62A TELLUS SERIES A-DYNAMIC METEOROLOGY AND OCEANOGRAPHY 220-227 (2010).</li> </ul>	See response above.
DATA 11	The Service should consider these additional references regarding the effects of climate change on sea levels:	The findings presented in those references are consistent with the qualitative statements provided in the Draft EIS which acknowledge that sea level rise is a climate change impact. A few sentences have been added to Section 4.3.1.2 and 4.4.1.2 that acknowledge that sea level rise could impact the road proposed in Alternatives 2 and 3. Specific numbers of project sea level rise are not provided in the EIS, since current climate change models are not accurate enough to predict project-specific sea level impacts.
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] Grinsted, A., J. C. Moore, and S. Jevrejeva, Reconstructing sea level from paleo and projected temperatures 200 to 2100 AD, 34 CLIMATE DYNAMICS 461-472 (2010).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] Hansen, J., et al., Global temperature change, 103 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA 14288-14293 (2006).</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] IPCC, CLIMATE CHANGE 2007: SYNTHESIS REPORT, An Assessment of the Intergovernmental Panel on Climate Change, Available at <a href="http://www.ipcc.ch">www.ipcc.ch</a> (2007).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] Jevrejeva, S., J.C. Moore, and A. Grinsted, How will sea level respond to changes in natural and anthropogenic forcing by 2100, GEOPHYSICAL RESEARCH LETTERS 37:L07703, doi:07710.01029/02010GL042947 (2010).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] Milne, G. A., et al., Identifying the causes of sea-level change, NATURE GEOSCIENCE 2 (2009).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] Pfeffer, W. T., J. T. Harper, and S. O'Neel, Kinematic constraints on glacier contributions to 21st-century sea level rise, 321 SCIENCE 1340-1343 (2008).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] Pritchard, H. D., et al., Extensive dynamic thinning on the margins of the Greenland and Antarctic ice sheets, NATURE doi:10.1038/nature08471 (2009).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[sea level rise, climate change] Rahmstorf, S., A semi-empirical approach to projecting future sea-level rise, 315 SCIENCE 368-370 (2007).</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• [sea level rise, climate change] Vermeer, M., and S. Rahmstorf, Global sea level linked to global temperature, 106 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA 21527-21532 (2009).</li> </ul>	See response above.
DATA 12	The Service should consider these additional references regarding the effects of climate change on ocean acidification:	The suggested articles have been reviewed and are specific to impacts to marine organisms from ocean acidification. The EIS acknowledges ocean acidification and associated impacts to wildlife. Since the level of climate change impacts from the project are estimated to be negligible, a more in depth discussion of specific impacts related to ocean acidification is not warranted and is outside of the scope of this EIS. Although ocean acidification is an important issue, this EIS focuses on potential impacts from the project itself and the contribution to cumulative effects. Climate change models are not precise enough to estimate project-level impacts on ocean acidification.
	<ul style="list-style-type: none"> <li>• [ocean acidification, climate change] Fabry, V.J., et al., Ocean acidification at high latitudes: the bellweather, 22 OCEANOGRAPHY 160-171 (2009).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• [ocean acidification, climate change] Fabry, V., et al., Impacts of ocean acidification on marine fauna and ecosystem processes, 65 ICES JOURNAL OF MARINE SCIENCE, 414-32 (2008).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• [ocean acidification, climate change] Feely, R. A., S. C. Doney, and S. R. Cooley, Ocean acidification: present conditions and future changes in a high-CO2 world, 22 OCEANOGRAPHY 36-47 (2009).</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[ocean acidification, climate change] Mathis, J.T., The Extent and Controls on Ocean Acidification in the Western Arctic Ocean and Adjacent Continental Shelf Seas [in ARCTIC REPORT CARD 2011], <a href="http://www.arctic.noaa.gov/reportcard">http://www.arctic.noaa.gov/reportcard</a> (2011).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>[ocean acidification, climate change] Orr, J.C., et al., Anthropogenic ocean acidification over the twenty-first century and its impact on calcifying organisms, 437 NATURE 681-686 (2005).</li> </ul>	See response above.
DATA 13	The Service should consider these additional references regarding the effect of roads on terrestrial and aquatic ecosystems:	The suggested references have been reviewed and cited in the impact assessments in Chapter 4.
	<ul style="list-style-type: none"> <li>[roads impacts on terrestrial and aquatic ecosystems] Trombulak, S., and C. Frissell, Review of ecological effects of roads on terrestrial and aquatic communities, 14 CONSERVATION BIOLOGY 18-30 (1999).</li> </ul>	The Trombulak and Frissell article was previously cited in the Draft EIS, but additional reference was made to this document within the land mammals section of Chapter 4.
	<ul style="list-style-type: none"> <li>[road impacts on terrestrial and aquatic ecosystems] U.S. Forest Service, FOREST ROADS: A SYNTHESIS OF SCIENTIFIC INFORMATION, General Technical Report PNW-GTR-509, Pacific Northwest Research Station (2001).</li> </ul>	This reference has been reviewed and cited in the impact assessments in Chapter 4 for land mammals Section 4.3.2.5 of the Final EIS.

SOC Code	Statement of Concern (SOC)	Response
DATA 14	The Service should consider these additional references regarding economic data:	<p>The employment data reported in Section 3.3.2 is official employment data. As requested by the commenter, these additional sources have been reviewed, and are either derived from the same data in the EIS, or are similar in magnitude. An assessment of commerce opportunities created by a road between King Cove and Cold Bay was not made, because it does fall under the stated purpose and need of the EIS. Also, commercial use of the road would not be allowed (though individuals commuting to work would be). The Act states,</p> <p><i>(A) IN GENERAL.—Except as provided in subparagraph (B), any portion of the road constructed on the Federal land conveyed pursuant to this subtitle shall be used primarily for health and safety purposes (including access to and from the Cold Bay Airport) and only for noncommercial purposes.</i></p> <p><i>(B) EXCEPTIONS.—Notwithstanding subparagraph (A), the use of taxis, commercial vans for public transportation, and shared rides (other than organized transportation of employees to a business or other commercial facility) shall be allowed on the road described in subparagraph (A).</i></p> <p>Potential employment and population increases induced by the road are discussed in Section 4.3.3.2 (and by reference Section 4.4.3.2).</p>
	<ul style="list-style-type: none"> <li>• <a href="http://www.alutianseast.org/index.asp?Type=B_BASIC&amp;SEC={1F268E2C-8D7D-41CE-92A5-FC9954BAA953}">http://www.alutianseast.org/index.asp?Type=B_BASIC&amp;SEC={1F268E2C-8D7D-41CE-92A5-FC9954BAA953}</a></li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• <a href="http://www.alieutianseast.org/index.asp?Type=B_BASIC&amp;SEC={F01C70F6-028E-4181-83DD-90BC0F27E9FE}">http://www.alieutianseast.org/index.asp?Type=B_BASIC&amp;SEC={F01C70F6-028E-4181-83DD-90BC0F27E9FE}</a> Access for Commerce and Commuting -- the Unspoken Purpose? I noted that, per the Websites linked below, only 13 persons in Cold Bay are employed, and nearly half of them work in the public sector. The employment data suggests two possible hidden agendas for running a road through Izembek:</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• So that Cold Bay residents could independently commute to jobs in King Cove, where the unemployment rate is 0.2%.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• So that commerce between the towns could be facilitated. If the hovercraft, once repaired, were still deemed inadequate to fulfill these purposes, other ways must be found to provide quick, dependable, inexpensive ways for * Cold Bay residents to commute to King Cove and for King Cove residents to travel to Cold Bay. Websites researched:</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• <a href="http://www.hovercraftalaska.com/mainpages/hnpages/cur_news/KingCove.html">http://www.hovercraftalaska.com/mainpages/hnpages/cur_news/KingCove.html</a></li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• <a href="http://en.wikipedia.org/wiki/Cold_Bay,_Alaska">http://en.wikipedia.org/wiki/Cold_Bay,_Alaska</a></li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• <a href="http://www.commerce.state.ak.us/dca/commdb/CIS.cfm?Comm_Boro_Name=Cold%20Bay">http://www.commerce.state.ak.us/dca/commdb/CIS.cfm?Comm_Boro_Name=Cold%20Bay</a></li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• <a href="http://www.zipdatamaps.com/99571">http://www.zipdatamaps.com/99571</a></li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• <a href="http://en.wikipedia.org/wiki/King_Cove,_Alaska">http://en.wikipedia.org/wiki/King_Cove,_Alaska</a></li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• <a href="http://www.commerce.state.ak.us/dca/commdb/CIS.cfm?Comm_Boro_name=King%20Cove">http://www.commerce.state.ak.us/dca/commdb/CIS.cfm?Comm_Boro_name=King%20Cove</a></li> </ul>	See response above.
DATA 15	The Service should consider this additional reference regarding endangered species:	The suggested references have been reviewed and cited in the impact assessments in Chapter 3 Section 3.2.7.
	<ul style="list-style-type: none"> <li>• Kirchoff, M. and V. Padula. 2010. The Audubon Alaska WatchList 2010. Audubon Alaska, Anchorage, AK 99501.</li> </ul>	See response above.
DATA 16	The Service should consider this additional reference regarding effect of human impacts on the environment:	See response above.
	<ul style="list-style-type: none"> <li>• Please see the article linked below and especially the accompanying photos, which illustrate what can happen when an erstwhile quiet nature-area becomes a tourist magnet: <a href="http://www.hcn.org/blogs/goat/trampled-by-tourists?utm_source=wcnl&amp;utm_medium=email">http://www.hcn.org/blogs/goat/trampled-by-tourists?utm_source=wcnl&amp;utm_medium=email</a></li> </ul>	The suggested reference has been reviewed and determined not to be applicable to Izembek National Wildlife Refuge.
DATA 17	The Service should consider reviewing and incorporating additional information:	Additional information provided in submission 51978 has been reviewed and incorporated.
	<ul style="list-style-type: none"> <li>• The general Cold Bay region data included in the Affected Environment/Physical Environment section is not considered adequate [additional information proposed for inclusion in Submission 51978].</li> </ul>	Additional information provided in submission 51978 has been reviewed and incorporated where appropriate. For example, extensive revisions have been made to the Tundra Swan discussions in Chapter 4 based on the report by ABR 2012 provided with this submission. Other elements of Submission 51978 have been responded to under other Statements of Concern, notably Wetlands (Section 4.3.2.2) Birds (Section 4.3.2.4) and Land Mammals (Section 4.3.2.5).

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>As stated previously, there are several areas where additional data would be helpful or essential to the Secretary of the Interior’s decision. It is incumbent upon the Service to obtain the data necessary for an informed decision, particularly for any impact category considered that results in a major adverse impact. Recommend the Service meet with the cooperating agencies as soon as possible to discuss incomplete information and how best to obtain additional or missing data. [Draft EIS p. 4-2 Section 4.1.2]</li> </ul>	<p>The Service has made numerous requests to the cooperating agencies for data to support the analysis of the EIS, and has worked to incorporate all information received. Coordination meetings are held approximately weekly. On July 12, 2012 the Service met with cooperating agencies to discuss the draft Comment Analysis Report and to make assignments for responses to comments relevant to the cooperating agencies. Information received has been incorporated as applicable.</p>
DATA 18	<p>The Service should consider these additional references regarding hovercraft service suspension:</p>	<p>See response to each of the sub-components of this statement of concern.</p>
	<ul style="list-style-type: none"> <li>While the Aleutians East Borough is stating that they cannot afford to operate the hovercraft, and that design issues also prohibit the use during cold weather, they are indeed taking this same hovercraft to another community, outfitting it with appropriate gear for cold weather, and have made a commitment to fund its operation for 20 years. This information should have been included in the Draft EIS (although it may have been released by the Aleutians East Borough too late to include), but at least should be included in the Final EIS. The above mentioned documents can be viewed on the Aleutians East Borough website at the following location: (they are found through the tab on the left column for the “Clerks Dept.”, then “Assembly Meeting Packets”, then under packets for the dates March 21, 2012 and April 23, 2012  <a href="http://aleutianseast.org/vertical/sites/%7BEBDABE05-9D39-4ED4-98D4-908383A7714A%7D/uploads/ASSEMBLY_MTG._MARCH_21_2012.pdf">http://aleutianseast.org/vertical/sites/%7BEBDABE05-9D39-4ED4-98D4-908383A7714A%7D/uploads/ASSEMBLY_MTG._MARCH_21_2012.pdf</a>  <a 448="" 545="" 870"="" 908="" href="http://aleutianseast.org/vertical/sites/%7BEBDABE05-&lt;/a&gt;&lt;/li&gt; &lt;/ul&gt; &lt;/td&gt; &lt;td data-bbox="> <p>The Aleutians East Borough indicates that the situation in Akutan is different than in King Cove. The community of Akutan is on an island – not mainland Alaska like King Cove. The new airport at Akutan is on Akun Island, which is six miles to the east of Akutan Island. There is no possibility to provide a land connection between the community and its airport. There is no land-based runway in Akutan. In 2007, the Federal Aviation Administration issued a Finding of No Significant Impact and Record of Decision, which authorizes the construction of a land-based airport on Akun Island, approximately 6 miles from the City of Akutan. That Record of Decision includes a provision providing for use of a marine link using a hovercraft to provide transportation between the airport and the community. Conditions on Akun Island at Surf Bay prohibit the use of a conventional monohull or catamaran vessel to provide this service.</p> <p>The hovercraft has been moved to the City of Akutan, but the Aleutians East Borough does not know how it will perform providing the marine link between Akun and Akutan Islands.</p> </a></li></ul>	

SOC Code	Statement of Concern (SOC)	Response
	<p>9D39-4ED4-98D4-908383A7714A%7D/uploads/ASSEMBLY_MTG._APRIL_23_2012(1).pdf</p>	<p>Weather and sea conditions are similar in some aspects compared to Cold Bay, and different in other aspects. The Aleutians East Borough has concerns about how the hovercraft will perform over the long-term in this application. Since use of a hovercraft is part of the Record of Decision, the Aleutians East Borough feels obligated to attempt to use the hovercraft to see if it can operate successfully. In the case of King Cove-Cold Bay, three years of unsuccessful service proved that the hovercraft was unreliable and did not work there.</p> <p>The referenced Assembly packages cover minutes of Assembly meetings that occurred on February 16, 2012, March 8, 2012 and March 21, 2012. The following summarizes the relevant content contained in these documents.</p> <p>Feb. 16, 2012: There is a brief reference under the discussion on the operating budget that notes the AEB is spending money to get the hovercraft ready for the move to Akutan.</p> <p>March 8, 2012: There is no discussion related to the hovercraft.</p> <p>March 21, 2012: Administrator Sharon Boyette provided a brief report on the work underway to get the hovercraft ready to move Akutan under New Business.</p>

SOC Code	Statement of Concern (SOC)	Response
DATA 19	The Service should consider these additional references regarding land use:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>Fact sheet: GENERALLY ALLOWED USES ON STATE LAND - Alaska Department of Natural Resources Aug. 2011 [attachment 093-gen_allow_use, found in the State of Alaska comments on the Draft EIS. Incorporate this information in the land use section that describes uses that will no longer be allowed on the state parcels involved in the potential land exchange.]</li> </ul>	More detail about uses allowed and not allowed on state land has been added to Land Use Section 3.3.1.2 and 4.3.3.1, incorporating information from the referenced fact sheet.
	<ul style="list-style-type: none"> <li>The Draft EIS should include information from and reference to the impact analysis of off-road vehicles for subsistence purposes on refuge lands and resources prepared by Sowl and Poetter. This analysis and the references within is critical for evaluating the potential impacts of off-road vehicles traveling on and adjacent to a road corridor through the isthmus, not just for subsistence use but in case of trespass into refuge lands as well. Sowl, K. and R. Poetter, Impact Analysis of Off-Road Vehicle Use for Subsistence Purposes on Refuge Lands and Resources Adjacent to the King Cove Access Project (2004).</li> </ul>	The extent to which a new road would impact subsistence activity is addressed in Subsistence Section 3.3.7, 4.3.3.7, and 4.4.3.7. A discussion of incursions beyond the road barriers (Alternatives 2 & 3) by all-terrain vehicles appears in numerous places in the Final EIS. Information from the Sowl and Poetter 2004 reference has been incorporated in numerous sections including Large Mammals (Brown Bears and Caribou) Sections 4.3.2.5/4.4.2.5 and Birds 4.3.2.4/4.4.2.4.
DATA 20	The Service should consider this additional reference regarding marine mammals:	The suggested reference (Jansen et al. 2010) provides updated scientific information regarding reactions of hauled-out harbor seals to vessels approaching within 500m. The suggested changes were incorporated into the Marine Mammal Management Plan section in Appendix F. The second recommended change to add harbor seal haul-out stipulations to section 4.2.2.7 is not relevant, since harbor seals are not included in this section. Changes were made to 4.2.2.6 and other sections that include harbor seals.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Revise setback distance [DIES Chapter 4, Page 4-38, Sec. 4.2.2.6, Paragraph 10 (stip.1)] [DEIS Chapter 4, Page 4-39, Sec. 4.2.2.7, Paragraph 5 (stip. 6)] from marine mammals. (Jansen et al. 2010) points to harbor seal disturbance by vessels at distances up to 500 m (546 yds). The National Marine Fisheries Service (NMFS) recognizes that the current guideline of 100 yards may be inadequate and is considering possible revisions. Although a NMML study focused on cruise ships, NMFS suggests 500 m (546 yards) for personal watercraft and smaller vessels since many observations note that smaller vessels--like kayak, zodiacs, etc.--often cause greater reaction in seals than larger vessels. “(a) not approach to within 100 yards of the marine mammal;” Suggested replacement text: “(a) not approach to within 100 yards of marine mammals in the water; Boat and motorized and non-motorized personal watercraft (PWC) traffic should remain a minimum of 500 m (546 yards) off shore when passing harbor seal haul-out areas.” Revise setback distance [DEIS Chapter 4, Page 4-39, Sec. 4.2.2.6, Paragraph 5 (stip.6)] [DEIS Chapter 4, Page 4-39, Sec. 4.2.2.7, Paragraph 1 (stip. 9)] “Remain at least 100 yards away from any marine mammal that is on land, rock or ice.” Suggested replacement text: “Remain at least 100 yards away from any marine mammal that is on land, rock or ice; Boat and motorized and non-motorized personal watercraft (PWC) traffic should remain a minimum of 500 m (546 yards) off shore when passing harbor seal haul-out areas.” Jansen, J.K., P.L. Boveng, S.P. Dahle, and J.L. Bengtson. 2010. Reaction of Harbor Seals to Cruise Ships. Journal of Wildlife Management 74(6):1186-1194; 2010; DOI: 10.2193/2008-192.</li> </ul>	<p>See response above.</p>

SOC Code	Statement of Concern (SOC)	Response
DATA 21	The Service should consider this suggestion for including statistics on the importance of a road:	See response below.
	<ul style="list-style-type: none"> <li>One commenter noted it was difficult to find statistics on how important the road to Cold Bay is to the people of King Cove; there is no research to date that has been conducted to show what the need is, and what effects the dangers have had on the residents who have to fly on a day-to-day basis.</li> </ul>	The Service agrees that there is a lack of quantitative data about transportation issues from residents' perspective. Sections 3.3.3 (Transportation) and 3.3.4 (Public Health and Safety) have been revised to include select narratives contributed by residents during scoping and Draft EIS public comment meetings. This expands understanding of the issues.
DATA 22	The Service should consider this additional reference regarding noise disturbance to wildlife:	The reference "California Off-Highway Vehicle Noise Study" was used to address the impact of increased noise from all-terrain vehicles in Section 4.3.1.6 and 4.4.1.6.
	<ul style="list-style-type: none"> <li>[noise disturbance, wildlife] Wayle Laboratories, CALIFORNIA OFF-HIGHWAY VEHICLE NOISE STUDY, Prepared for the State of California Department of Parks and Recreation (2005).</li> </ul>	See response above.
DATA 23	The Service should consider this additional reference regarding resources identified:	The description of public use in the EIS is sufficient to evaluate the proposed land exchange. The additional information provided was reviewed. The information about the cabins was incorporated as (King Cove Group 2012, available in Appendix G-3) in Public Use Sections 3.3.6.4 and 3.3.6.5.
	<ul style="list-style-type: none"> <li>Summary of Resources on 16,126 Acres of King Cove Ownership Identified in Subtitle E. [See Table 11 on page 27 of submission 51978]</li> </ul>	See response above.
DATA 24	The Service should consider these additional references regarding seismic data:	See response to each of the sub-components of this statement of concern.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The second sentence [Draft EIS Chapter 3, Page 3-16, Sec. 3.1.3.8, Paragraph 1] is very general and should be expanded or added to in order to make clear the potential for very large earthquakes. Leave statement from Stevens and Crow, 1994, but more recent references should be used (See comment). Suggest adding a sentence: The Aleutian subduction zone has generated multiple great earthquakes and associated tsunamis including the 1938 M8.3 Alaska Peninsula, the 1946 M7.8 Unimak, the 1957 M8.6 Fox Islands, the 1964 M9.2 Alaska, and the 1965 Rat Islands earthquakes (Davies et al., 1981; Johnson and Satake, 1994; Johnson et al., 1994; Plafker, 1969; Christensen and Beck, 1994; Beck and Christensen, 1991).</li> </ul>	<p>The Service agrees with the potential for earthquakes. Section 3.1.3.8 includes the suggested sentence.</p>
	<ul style="list-style-type: none"> <li>The Shumagin seismic gap is an outdated theory. [Draft EIS Chapter 3, Page 3-16, Sec. 3.1.3.8, Paragraph 1, Third sentence]Actually, we still do not understand how strain is being accommodated in the Shumagin gap. GPS suggests that it is accumulating a small amount of strain, but there is no record of large earthquakes in the gap. Suggest that the authors update their reference to a more modern description of the Shumagin gap. Some current information can be found in Freymueller and Beavan, 1999, Geophysical Research Letters, vol. 26, no. 21.</li> </ul>	<p>Cited information has been reviewed. A detailed study of the Shumagin gap is beyond the scope of this study and would not benefit the analysis of alternatives.</p>

SOC Code	Statement of Concern (SOC)	Response
DATA 25	The Service should consider these additional references regarding soil analysis:	The first three references cited were included in the References section of this EIS. The comment regarding soil types in the study area discusses the integrity of volcanic ash rich soil and its reaction to earthquake activity, road construction and traffic loads. The Service agrees with the conclusion that a more comprehensive investigation of soils would be required prior to road construction. Such investigation is beyond the scope of the study, but would be undertaken if a road alternative is selected and the land exchange is found in the public interest.
	<ul style="list-style-type: none"> <li>• [road construction and soil analysis] Golder Associates, Draft Final Data Report for Geotechnical Investigations, Rock Mapping and Potential Quarry Site Evaluations, King Cove Access Road Completion, King Cove, Alaska, prepared for USKH, Inc. (July 30, 2010).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• [road construction and soil analysis] Miller, Duane and Associates, Geotechnical Exploration-Supplement, Access Road King Cove, Alaska, report prepared for Aleutians East Borough,(December 18, 2003).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• [road construction and soil analysis] Miller, Duane and Associates, Geotechnical Exploration, King Cove to Cold Bay Access, King Cove, Alaska, report prepared for Aleutians East Borough (2000).</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• [road construction and soil analysis] Robinson, R. and B. Thagesen. 2004. Road Engineering for Development, 2nd Edition. CRC Press, 544p (see p. 175).</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Discrepancies regarding soil type exist between the 1979 National Cooperative Soil Survey information provided in the Draft EIS and information collected by consultants on behalf of the Aleutians East Borough. The Aleutians East Borough consultant reports describe the soil type as gravelly sands and sandy silts overlain by soft organic peat and silt. The National Cooperative Soil Survey describes the soils as Fibrists (peats) overlying volcanic ash. Volcanic ash soils can be unstable not only during seismic activity as stated in the Draft EIS, but also when agitated, such as during construction and operation of roads. Ashes that weather into allophanic clays are highly sensitive to disturbance and heavy compaction, such as occurs when roads are constructed. These materials should be avoided and are generally not recommended for road construction. Classification of soils is important, as soil type will affect both the stability and lifespan of the road, as well as interpretation of the impacts to hydrology, especially groundwater recharge and water quality impacts, and wetland function. To better assess the impacts of a road across the isthmus in Alternatives 2 and 3, a more comprehensive soil study is needed.</li> </ul>	See response above.
DATA 26	The Service should consider this additional reference regarding subsistence resources:	The resource values of all lands being exchanged, including those that would be transferred to federal ownership or to the State, have been revised for the Final EIS. Table 13 was considered a data source when the subsistence resource values of each parcel were assessed.
	<ul style="list-style-type: none"> <li>Table 13. Subsistence Resources Used by the King Cove Corporation Shareholders that are Directly Involved with the Proposed Land Exchange [For Table 13 see page 29 of submission 51978]</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
DATA 27	The Service should consider conducting a travel characteristic survey:	See response below.
	<ul style="list-style-type: none"> <li>• The King Cove Group reaffirms its offer to pay for a King Cove travel characteristic survey. The objective and expectation for this survey would be for the Service to have current, documented travel data to include in the Final EIS. In making this offer, it is realized that any survey would need to be conducted and analyzed completely independent of the King Cove Group. The King Cove Group would further offer to provide an initial travel survey instrument for Service to review, then Service/or its contractor could modify, as necessary, and engage, or execute the survey (possibly by subcontracting with a survey firm) in time for the information to be analyzed and included in the Final EIS.</li> </ul>	For analysis purposes in the EIS, we do not need a travel characteristic survey. We have collected enough information to adequately assess the transportation options for people from King Cove to the Cold Bay airport.
DATA 28	The Service should consider these additional references regarding evaluation of exchange lands:	See response below.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• [value of exchange lands not properly evaluated] U.S. Fish and Wildlife Service, Record of Decision, Proposed Land Exchange Yukon Flats National Wildlife Refuge Environmental Impact Statement (April 2010).</li> </ul>	<p>The comments suggest that the monetary value of the lands included in the exchange be determined using appropriate federal procedures and be used in the evaluation of alternatives. Section 6402 (c) of PL 111-11 states that the “conveyance of Federal land and non-Federal land under this section shall not be subject to any requirement under Federal law ...relating to the valuation, appraisal or equalization of land.”</p> <p>Additionally, it has been suggested that this section does not prohibit estimation of land values in broad terms, that it is important to inform the public of the value of the land proposed for exchange and that a basic assumption of value would be adequate for this purpose. The Service disagrees with this suggestion. Estimation or basic assumptions of land value would essentially be personal opinion, not substantiated or documented by a professional analysis of comparable land sales. Basic assumptions or estimations of the value of the land proposed for exchange would likely engender additional questions, comments and disagreement while not providing information that would assist in the evaluation of alternatives.</p>
	<ul style="list-style-type: none"> <li>• [value of exchange lands not properly evaluated] GAO, Chandler Lake Land Exchange Not in the Government’s Best Interest, Report RCED-90-5 (October 1989).</li> </ul>	<p>See response above.</p>
	<ul style="list-style-type: none"> <li>• [value of exchange lands not properly evaluated] U.S. General Accounting Office (GAO), Consideration of Proposed Alaska Land Exchanges Should be Discontinued, GAO Report RCED-88-179 (September 1988).</li> </ul>	<p>See response above.</p>

SOC Code	Statement of Concern (SOC)	Response
DATA 29	The Service should consider these additional references regarding wetland and hydrology impacts:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>[wetland and hydrology impacts] Arp, C.D. and T. Simmons, Analyzing the impact of Off-Road Vehicle (ORV) Trails on Watershed Processes in Wrangell-St. Elias National Park and Preserve, Alaska, Environmental Management, DOI 10.1007/s00267-012-9811-z (2011).</li> </ul>	The reference (Arp and Simmons 2011) was reviewed but not cited in this EIS. The environmental conditions and the source of impacts vary greatly from the conditions addressed in this EIS. Arp and Simmons studied boreal and arctic parkland environments with permafrost soils, which are not characteristics of the Cold Bay region.
	<ul style="list-style-type: none"> <li>[wetland impacts] Winter, T.C., A Conceptual Framework for Assessing Cumulative Impacts on the Hydrology of Nontidal Wetlands, 12 ENVIRONMENTAL MANAGEMENT 605-620 (1988).</li> </ul>	The reference (Winter 1988) has been reviewed and the conclusion related to hydrology uncertainties has been cited in the Hydrology section of Chapter 4 (Section 4.3.1.4).
DATA 30	Designated wilderness is managed under federal law and policy. Therefore, the Final EIS should not rely on the personal views of Landres, et al., in Keeping it Wild, and instead base the analysis on relevant law and policy. As noted on the first page of Keeping it Wild, "This publication is a report developed by a technical working group and solely represents the views of its authors. It does not represent and should not be construed to represent any agency determination or policy."	While the Author's Note in Landres et al. (2008a) does state that "the document should not be construed to represent any agency determination or policy," the document is presented as an interagency strategy. As noted in the Introduction to the report, "The Interagency Wilderness Character Monitoring Team representing the Department of the Interior (DOI) Bureau of Land Management, DOI Fish and Wildlife Service, DOI National Park Service, DOI U.S. Geological Survey, and the U.S. Department of Agriculture Forest Service developed this strategy." While Landres served as the chair of the team that developed the strategy, the other eight authors of the paper all represent the federal agencies listed above. This reference will remain as part of the wilderness discussions in Chapters 3 and 4.

## Editorial (EDI)

SOC Code	Statement of Concern (SOC)	Response
EDI	Comments associated with specific text edits to the document (i.e. grammar, punctuation, and consistency in usage).	Category Code; no response required.
EDI 01	The Service should consider incorporating the following edits into the Executive Summary.	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>[Ex Sum, page 7, paragraph 2-Affordable...] Needs a statement that a new road does not guarantee that travel between King Cove and Cold Airport will not be restricted for extended periods of time, such as during winter snow periods.</li> </ul>	Accepted. Language was added to third paragraph of “Affordable Transportation” section of the Executive Summary and Section 1.4.3 of Chapter 1
	<ul style="list-style-type: none"> <li>[Ex Sum, page 8] Because the main desire for the road is affordable access in cases of emergency, there should be a table that indicates the number of days that the PenAir plane was unable to service King Cove because of weather issues (average over years) and compare that to the hovercraft during years when both were operational. It would also be important to know if there were any days that road between Cold Bay and the Air Force facility (or if data are available to the former Air Force facility at Grant Point) was not passable because of snow.</li> </ul>	Not accepted. This data has been requested from PenAir and Aleutians East Borough, and was not received. All available data related to the reliability of scheduled air service and hovercraft operations have been included in the EIS. Data are not available on road closures between Cold Bay and the Air Force facility.
	<ul style="list-style-type: none"> <li>[Ex Sum, page 22, Section ES-1.6, Paragraph Alt 2-Land Last sentence] The Draft EIS states, “The road alternatives would result in distinctive changes transportation options.” Change to “The road alternatives would result in distinctive changes to transportation options.”</li> </ul>	Accepted.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Ex Sum, page 29, Section ES-Tbl 6: Noise-overall effects, Paragraph Alt 5-1st sentence] Why not put decibel levels at the same distance as the hovercraft (Alt 1) so the reader can compare noise level differences directly?</li> </ul>	Accepted. Alternative 1 was re-defined. Revisions were made in Exec. Summary table and discussions of direct impacts under Alternatives 1, 2, 3 in Chapter 4.
	<ul style="list-style-type: none"> <li>[Ex Sum, page 29, Section ES-Tbl 6: Noise-cumm effects, Paragraph Alt 3 2nd sentence] How can the footprint of the road be less when the road is longer in Alt 3 than in Alt 2?</li> </ul>	Not accepted. See Chapter 2 of the EIS for additional design detail for each of the alternatives. Alternative 2 would be 18.5 miles long, with an average footprint width of 47.6 feet. Alternative 3 would be 20.0 miles long with an average footprint width of 41.4 feet. The differences in footprint width relate to the topography encountered on each route.
	<ul style="list-style-type: none"> <li>ES-24 - The effects table must be conformed to reflect changes recommended in these comments. Particularly changing the effects on wildlife, cultural resources from major to minor and/or negligible.</li> </ul>	Accepted. This table was edited to reflect any changes in the summary impact ratings.
EDI 02	The Service should consider incorporating the following edits into Chapter 1.	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>Chapter 1 Page 1-8 Section 1.5 Paragraph 1 The EIS may not provide all the technical and scientific basis for federal regulatory and permit decisions. Replace with "The EIS may provide some of the technical and scientific basis ... "</li> </ul>	Accepted.
	<ul style="list-style-type: none"> <li>Page 1-2--Add the following to par.1: add "As a result of the EIS record of decision the funding for airport improvements was not spent. That funding was redirected to the Marine-highway link approved by the Record of Decision for the 2003 EIS."</li> </ul>	Accepted.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Page 1-4: - Izembek State Game Refuge, add the word “unanimously” after the words: “the Alaska legislature passed.”</li> </ul>	Accepted.
	<ul style="list-style-type: none"> <li>Page 1-5 - Add the following to par. 1: Any administrative appeal or litigation which delays construction also acts to toll this 7 year expiration of legislative authority.</li> </ul>	Accepted.
	<ul style="list-style-type: none"> <li>Page 1-5 - Add a bullet at the bottom of the page: “Serving the public interest by implementing the land exchange and subsequent road construction.”</li> </ul>	Not accepted. The Secretary of the Interior must determine that the land exchange and proposed road are in the public interest for the project to be approved. This is not a specific objective of the proposed action.
	<ul style="list-style-type: none"> <li>Page 1-6 under Health Safety description - 3rd paragraph: Delete the word “infrequent” and substitute “regular” before the words “time sensitive” These emergencies happen on a regular basis at all times of day throughout the year - more than at least once a month. This makes the need more than infrequent.</li> </ul>	Not accepted. The term “regular” implies that the emergencies would be recurring at fixed intervals, which they do not.
	<ul style="list-style-type: none"> <li>[Page 1-6 under Health Safety description - 3rd paragraph:] Delete the word “hovercraft and” - A hovercraft is a marine vessel. Since the hovercraft will no longer be in operation, the reference to hovercraft should be eliminated.</li> </ul>	Not accepted. However, text in the third paragraph of Section 1.4.1 has been edited to reflect that medical evacuations had historically arrived at the Cold Bay Airport via hovercraft.
	<ul style="list-style-type: none"> <li>[Page 1-6 under Health Safety description - 3rd paragraph:] Re: helicopters at Cold Bay: Insert the words “but not steadily” after the word “temporarily”</li> </ul>	Not accepted. However, text in the third paragraph of Section 1.4.1 has been edited to reflect that helicopters are not constantly stationed at Cold Bay.
	<ul style="list-style-type: none"> <li>Page 1-7: Is the requirement for final approach at King Cove to be VFR mandatory? If so, the word “should” needs to be changed to “must.”</li> </ul>	Accepted. The sentence reads,, "... and the final 5.2 nautical mile leg is to be flown visually . . ."

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Pages 1-8- under affordable transportation add the following: “Now that the hovercraft service has been eliminated, there is no regular, scheduled, or affordable marine service. The only marine service available is private fishing vessel which requires a 2.5 hour trip and the scaling of a 30 foot ladder in inclement weather which has prevented flights from the King Cove airport. These private fishing vessel trips cost up to \$2500. This eliminates them from any recognition as affordable transportation.”</li> </ul>	<p>Not accepted. However, Section 1.4.3 has been edited to reflect that the hovercraft is no longer operating between King Cove and Cold Bay.</p>
	<ul style="list-style-type: none"> <li>Page 1-10 - add to the last sentence in the last paragraph the following: “tribal” after the word “local”.</li> </ul>	<p>Accepted.</p>
	<ul style="list-style-type: none"> <li>Chapter 1, Page 1-25, Sec. 1.6.4, Paragraph 1 First bullet needs to be corrected Alaska Department of Natural Resources, Division of Mining, Land and Water, Water Section’s permit for Temporary Water Use Permit</li> </ul>	<p>Accepted.</p>
	<ul style="list-style-type: none"> <li>Chapter 1, Page 1-25, Sec. 1.6.4, Paragraph 1 Second bullet needs to be corrected Alaska Department of Natural Resources, Division of Mining, Land and Water, Southcentral Regional Office’s authorization for rights-of-way or tideland leases.</li> </ul>	<p>Accepted.</p>
	<ul style="list-style-type: none"> <li>Chapter 1 Page 1-8 Section 1.5 Paragraph 1 The EIS may not provide all the technical and scientific basis for federal regulatory and permit decisions. Replace with "The EIS may provide some of the technical and scientific basis ... "</li> </ul>	<p>See response to each of the sub-components of this statement of concern.</p>

SOC Code	Statement of Concern (SOC)	Response
EDI 03	The Service should consider incorporating the following edits into Chapter 2.	Not accepted. The Table 3 referenced in the comment was submitted by the commenter to be added to Chapter 2 of the document. Revisions have been made to Table 2-8, Impact Summary by Alternative, in response to more detailed comments and further analysis conducted during preparation of the final EIS. Please refer to Table 2-8 in Chapter 2 for details.
	<ul style="list-style-type: none"> <li>Table 3. KCG Summary of Key Issues and Overall Beneficial, Negative, or No Effect Conclusions for Alternatives 1, 2, and 3 with Reference to Alternatives 4 and 5 [See pages 1-9 of Attachment 1 to KCG Comments]</li> </ul>	Accepted. Figure 2.6 moved closer to discussion of the figure in the text.
	<ul style="list-style-type: none"> <li>Chapter 2, Page 2-22 Figure 2-6 is on page 2-22 but the narrative explanation of the figure is on page 2-36 Insert the figure closer to the text</li> </ul>	Accepted. Edited text to reflect that Alaska Department of Transportation and Public Facilities would be the project applicant.
	<ul style="list-style-type: none"> <li>2-38 2.4.3 Last paragraph DOT&amp;PF would be the “project applicant”.</li> </ul>	Accepted.
EDI 04	The Service should consider incorporating the following edits into Chapter 3.	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>Page 3-214, 3rd paragraph, 1st sentence - what is the source of information for the statement that Cold Bay’s population fluctuation is in “direct response to military operations” in the area during the 1970’s, 1980’s, and 1990’s?”</li> </ul>	The source was the 2003 EIS; the sentence has been deleted.
	<ul style="list-style-type: none"> <li>[Affected Environment/Physical Environments - General Comments] Paragraph 2 add the words “ or Alaska Peninsula Refuge or potential exchange lands” at the end of the first sentence.</li> </ul>	Not accepted. It is not clear where the text edit is requested.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Page 3-234 - 239 Why is federal employment data not included in the pie charts for each City?</li> </ul>	<p>Not accepted. As stated in the text: The data in the figure above do not include estimates of federal employees. These data are not available because the federal government does not participate in the same unemployment insurance program as non-federal employers, which is the program that the Department of Labor uses to match and estimate employment by place of residence (Fried 2010).</p>
	<ul style="list-style-type: none"> <li>Page 3-245 - The explanation on needs to be footnoted on the table on these pages. Otherwise the table is incomplete.</li> </ul>	<p>Not accepted. It is not clear where the text edit is requested.</p>
	<ul style="list-style-type: none"> <li>Chapter 3, Page 3-261, Figure 3.3-19, Paragraph 1 I believe the AK Peninsula boundary is incorrectly displayed. Fix in FEIS</li> </ul>	<p>Not accepted. The boundary of Alaska Peninsula National Wildlife Refuge is displayed correctly in Figure 3.3-19.</p>
	<ul style="list-style-type: none"> <li>Chapter 3, Page 3-207, Sec. 3.3.1, Paragraph 4 Bristol Bay Area Plan: The DEIS says that the “General use areas area ... considered unsuitable for intensive development.” Replace “unsuitable” with: are generally not considered suitable for development. Use this language in all sections.</li> </ul>	<p>Accepted. Text edited in Section 3.3.10.4.</p>
	<ul style="list-style-type: none"> <li>Chapter 3, Page 3-305, Sec. 3.3.10, Paragraph 3 Bristol Bay Area Plan: The DEIS says that the “.management regime... considers the area as unsuitable for intensive development.” Replace “unsuitable” with: are generally not considered suitable for development. Use this language in all sections.</li> </ul>	<p>Accepted. Text edited (Section 3.3.10.4).</p>
	<ul style="list-style-type: none"> <li>Chapter 3, Page 3-16, Sec. 3.1.3.8, Paragraph 1 Aleutian Seismic zone Change to Aleutian subduction zone</li> </ul>	<p>Accepted.</p>
	<ul style="list-style-type: none"> <li>Chapter 3, Page 3-150, Sec. 3.2.5, Paragraph 1 There is a typo in the last sentence where the word “quantity” is repeated twice. Replace the first “quantity” with “quality”.</li> </ul>	<p>Accepted.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>3-103 Anadromous Waters Suggest this section be titled “Anadromous Fish Waters”.</li> </ul>	<p>This suggested edit was not made because the State of Alaska Catalog of Waters for Spawning, Rearing, or Migration of Anadromous Fishes refers to them as “anadromous waters”.</p>
	<ul style="list-style-type: none"> <li>3-29 3.1.5.2 Second to last paragraph on this page beginning w/ ‘Petroleum hydrocarbon contaminated soil...’, revise the last sentence by removing the 2010 date. After which add the following statements: ‘In 2010 the USCG 1,100 cubic yards of fuel-contaminated soil from three stockpiles that was determined to all be below site-specific alternative cleanup levels as a result of the 2006 characterization sampling. In 2010 the USCG also conducted ground water and soil data gap sampling. According to the subsequent draft 2011 report, ground water analysis results in all but two monitoring wells were below ADEC cleanup levels in 2006, and the remaining two with 2006 exceedances were below ADEC cleanup levels in 2010. Fuel-contaminated soil exceeding the site-specific alternative cleanup level was identified in a wetland and the upgradient stream drainage in 2010.</li> </ul> <p>The results of soils sampled in 2010 from a former battery disposal area associated with a landfill indicated lead contamination that will also require further characterization and removal. The USCG remains the responsible party for all of the known and potentially unknown contamination issues at Sitkinak Loran C Station. ADEC recommends that all contamination and remediation issues be adequately identified and addressed by the USCG prior to the transfer of the land to any new landowner and/or any change of land use occurs; as also discussed on pages 3-23 and 3-24 section in section 3.1.5 of this EIS.</p>	<p>Accepted. However, the last sentence of the suggested edits was not included as written. As stated in Appendix B, the proposed solution is for the Coast Guard to survey and retain the small area with the contaminated buildings and soil, including any area needed to account for migration of the contaminated plume into adjacent soils. This contaminated parcel would be excluded from the conveyance to the State of Alaska until the cleanup has been completed. Then, the retained parcel would be conveyed to the State of Alaska.</p>

SOC Code	Statement of Concern (SOC)	Response
EDI 05	The Service should consider incorporating the following edits into Chapter 4.	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>Chapter 4, Page 4-176, Sec. 4.3.3.1, Paragraph 7 State parcels: “The area plan considers these lands generally unsuitable for intensive development.” Replace “unsuitable” with: are generally not considered suitable for development. Use this language in all sections.</li> </ul>	Accepted. Text edit made in Section 4.3.3.1. No other occurrences of this language were found in Chapter 4. Language was corrected in Chapter 3 as well.
	<ul style="list-style-type: none"> <li>Chapter 4, Page 4-174 Formatting is inconsistent - underline of subject titles and no underline.</li> </ul>	Accepted. Formatting inconsistencies have been corrected in Section 4.3.3.1.
	<ul style="list-style-type: none"> <li>Chapter 4, Page 4-154, Sec. 4.3.2.5, Paragraph 2 Typo: degree of visual obstruction - caribou are reluctant to cross when they cannot(see the other side Suggested replacement text: degree of visual obstruction - caribou are reluctant to cross when they cannot see the other side</li> </ul>	Accepted.
	<ul style="list-style-type: none"> <li>4-122 4.3.2.2 Paragraph 3 The sentence says that there would be approximately 162 drainage structures installed, 154 of these being “cross drainage culverts.” It is not clear if the cross drainage culverts are necessary for road runoff, perennial streams crossing or both. As written it seems to imply that the road would cross approximately 154 small drainages. The fourth sentence says, “Cross drainage culverts will be placed in uplands areas to maintain the existing localized drainage patterns. Are the 154 cross drainage culverts referenced in the 1st sentence the same cross drain culverts reference in the 3rd sentence that will be place in uplands to maintain existing drainage patterns? Only those cross drainage structures being placed in wetlands (jurisdictional and non-jurisdictional) should be discussed in this section. Cross drainage culverts used in uplands to maintain existing localized drainage patterns should be discussed in Section 4.3.1.4 Hydrology/Hydrologic Processes</li> </ul>	Text edits made to clarify discussion around cross drainage culverts. Text edits have also been made in Section 4.3.1.4 to add discussion on cross drainage culverts. Although many of these cross drainage structures would be placed in uplands, the potential effects they could have on hydrology and contiguous wetlands is noteworthy.

SOC Code	Statement of Concern (SOC)	Response
EDI 06	The Service should consider incorporating the following edits into Appendix F.	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>Appendix F, page 8 should specifically exclude the transportation of fish and processed fish products as a commercial use prohibited from Alternative 2 and 3, as required by Public Law 111Â 111, Subtitle E.</li> </ul>	Accepted. Text has been revised to indicate most commercial use of the road would be prohibited. As stated in the Act, "any portion of the road constructed on the federal land conveyed shall be used only for noncommercial purposes. The only exceptions are the use of taxis, commercial vans for public transportation, and shared rides (other than organized transportation of employees to a business or other commercial facility). Therefore, other forms of commercial transportation including moving commercially harvested fish or fish products or other freight would not be allowed. Guides would not be allowed to use the road for guided hunts or commercial wildlife viewing. These limitations of use shall be enforced in accordance with an agreement between the State of Alaska and the Department of the Interior as called for in the Act.
	<ul style="list-style-type: none"> <li>Appendix F, page F-4, Sec. A., Paragraph (vi) The Alaska Department of Fish and Game issues Fish Habitat Permits. "Water withdrawals from a fish bearing stream will be done in accord with a habitat permit form the State of Alaska." Recommended replacement text: "Water withdrawals from a fish bearing stream will done in accordance with a Fish Habitat Permit issued by the Alaska Department of Fish and Game."</li> </ul>	Accepted.
EDI 07	The Service should consider incorporating the following edits into project presentations.	See response to each of the sub-components of this statement of concern.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Also, in the PowerPoint presentation, you guys might want to change -- you mentioned it was 3,000 years, I heard somebody else mention 5,000, and in your full version you do say that -- you know, according to the Anangula Site and some of the other archeological findings around the peninsula, it's closer to 8,000 to 10,000 years of experience that the Aleuts have out in the region. So you might want to correct that slide.</li> </ul>	<p>Acknowledged. No text edits necessary within EIS document.</p>

## Government to Government Consultation (G2G)

SOC Code	Statement of Concern (SOC)	Response
G2G	Comments on consultation with Tribal Governments.	Category Code; no response required.
G2G 01	Concern was expressed by some Cooperators that "unilateral" actions by the Service in finalizing impact ratings in the Draft EIS without additional consultation were in violation of federal law and regulation and duty of the Service to consult with the Agdaagux and Belkofski Tribes prior to any decision.	For the purposes of responding to this comment, it is assumed that the word "decision" refers to the impact ratings in the EIS not the Record of Decision for this EIS. There are seven formal cooperators assisting the Service in preparing this EIS: the Agdaagux Tribe of King Cove (a federally recognized tribal government), Native Village of Belkofski (a federally recognized tribal government), State of Alaska, City of King Cove, Aleutians East Borough, King Cove Corporation, U.S. Army Corps of Engineers, and Federal Highway Administration, Western Federal Lands. The Omnibus Public Land Management Act of 2009 Subtitle E -- Izembek National Wildlife Refuge Land Exchange stated that the State, The Aleutians East Borough, the City of King Cove, the Tribe [specifically Agdaagux Tribe of King Cove], and any federal agency that has permitting jurisdiction over the proposed road may participate as a cooperating agency. The U.S. Army Corps of Engineers would have permitting authority over the road. The Federal Highway Administration, Western Federal Lands was invited to participate as a cooperating agency because of its expertise in road design and construction and the role that the Federal Highway Administration would likely have in funding a road. The Native Village of Belkofski requested to be a cooperating agency. All cooperating agencies signed memoranda of understanding with the Service that clearly indicates the roles and responsibilities of the cooperating agencies and the lead agencies. Each Memorandum of Understanding clearly indicated that the Service "reserves the right to make the final decisions

SOC Code	Statement of Concern (SOC)	Response
		<p>regarding the content of the EIS documents." Each cooperating agency also agreed to "recognize the Service has the ultimate responsibility for the content and preparation of the EIS." The Service provided each cooperating agency an "internal review draft" of the Draft EIS at the same time providing copies of the "internal review draft" to various Service staff members including several wildlife biologists with detailed knowledge of the project area and key wildlife species that inhabit the area. Hundreds of comments were received from cooperators and staff on the "internal review draft" Lead Service staff worked with their third party EIS contractor to address all the comments received on the "internal review draft" and to finalize the Draft EIS for public review.</p> <p>In compliance with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, the Service initiated government-to-government consultation with twelve potentially affected Federally Recognized Tribes: Agdaagux Tribe of King Cove; Native Village of Belkofski; Chevak Native Village; Native Village of False Pass; Native Village of Hooper Bay; Native Village of Nelson Lagoon; Newtok Village; Native Village of Paimiut; Pauloff Harbor Village; Native Village of Scammon Bay; Qagan Tayagungin Tribe of Sand Point Village; and Native Village of Unga</p> <p>Letters were sent to the Federally Recognized Tribes on June 16, 2010 stating that public scoping recently occurred and the Service offered to conduct separate meetings to explain the proposal and hear their thoughts. The letters asked if the tribes had any thoughts on the topics of cultural, traditional, or religious sites that could be affected; any known graves or archaeological sites in the project area; any formal tribal positions on the proposal; any information on fish and wildlife that may be affected and any other input the tribe would like</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>to contribute. One Tribal consultation meeting was held on August 25, 2010 with representatives from the Agdaagux Tribe of King Cove and the Native Village of Belkofski.</p> <p>In January of 2012, coinciding with the release of the Preliminary Draft EIS, the Service again sent letters to all 12 tribes plus the King Cove Corporation to re-initiate consultation. The Agdaagux and Belkofski tribe indicated that they wanted to consult with the Service. Therefore, the Regional Director, Alaska Refuge Chief and the Chief of Planning visited King Cove for formal consultation with the two tribes. At the time of this response, consultations are pending with two tribal governments in Sand Point and additional tribal consultations are pending with Agdaagux Tribe of King Cove and the Native Village of Belkofski. In summary, the Service believes it has fully met its responsibilities to work with cooperating agencies as spelled out in the signed MOUs with each cooperating agency and continues to meet its responsibilities to consult with Tribal governments under Department and agency policies. As lead agency, the Service makes the final decision on the EIS after consulting with the cooperators in accordance with the National Environmental Policy Act and its implementing regulations.</p>

SOC Code	Statement of Concern (SOC)	Response
G2G 02	<p>The Service needs to provide documentation to support the 1986 expansion [of the Ramsar designation] and coordinate with the King Cove Corporation and the two Tribes to fulfill the Secretary of the Interior's Trust Responsibility.</p>	<p>The Ramsar designation is based upon scientific criteria for assessing wetlands ecological values. A designation recognizes exceptional wetlands values, but does not establish any regulatory authority over land owners. The boundary of the designated Ramsar site is contiguous with the external boundary of Izembek National Wildlife Refuge as of April 1986. The total area of the designated site was originally recorded as 168,433 hectares and this area has been carried forward in all official documentation. The Ramsar boundary encompasses all State owned and privately owned lands within the Izembek National Wildlife Refuge as of the date of designation. The Secretary of the Interior's Trust Responsibility creates a wide discretion for the Secretary of the Interior to act to protect Alaska Native interests, and a number of statutes and recent policy statements provide additional direction. There was no risk to tribal rights or ANCSA corporation land rights as land owners as there is no regulation of use or development of lands associated with the designation. Executive Orders concerning consultation with Tribal Governments were issued starting in 2000 with EO 13175, subsequent to the designation process. The Service was not the lead agency on the 2003 King Cove Access Project EIS. The statements that the Ramsar wetlands were not mentioned during the analysis of the 2003 EIS and about Service compatibility determinations not related to this project are not relevant to this EIS.</p>

## Legislative History (HIST)

SOC Code	Statement of Concern (SOC)	Response
HIST	History of previous legislative and administrative actions regarding a proposed King Cove Road.	Category Code; no response required.
HIST 01	Residents of the project area feel that the history of the proposed road from King Cove to the Cold Bay Airport has not been adequately described within the Draft EIS. A more detailed project history should be included as an appendix to more fully describe prior road development in the region, the administrative and legislative history, and the efforts of local residents to develop a road across the Izembek National Wildlife Refuge.	The King Cove Group submitted a detailed project history from their perspective, which has been included in the administrative record of this project and is available in the sample comments attachment to Appendix G (Appendix G-3), the Comment Analysis and Response Report.
HIST 02	The Service should revise the EIS to highlight that since 1985, the U.S. Fish and Wildlife Service has consistently found that a road across the narrow isthmus between Izembek and Kinzarof Lagoon would be incompatible with the purpose for which the Izembek National Wildlife Refuge had been established and would cause significant long-term damage to important fish and wildlife habitat.	Section 1.6.2.2 and 1.6.2.3 describe concerns and threats due to proposed roads as found in Comprehensive Conservation Plans for the Izembek and Alaska Peninsula National Wildlife Refuges and in the land protection plan for the Izembek National Wildlife Refuge. It is not accurate to state that these constitute a formal determination that a road is incompatible with the purpose of the refuge.
HIST 03	The EIS should be revised to show that prior to the establishment of the Izembek National Wildlife Refuge and Izembek Wilderness, residents living in the King Cove area were never contacted about the proposed designation. It should also show that residents were denied a full participation in the initial hearings on the refuge, an action that established the wilderness and subsequently stranded the community.	Local residents have expressed strong concerns about the lack of adequate participation in deliberations leading to the establishment of the Izembek National Wildlife Refuge and Izembek Wilderness. This viewpoint is well documented in the public comments and in the project's administrative record.

SOC Code	Statement of Concern (SOC)	Response
HIST 04	<p>The Service should indicate in the EIS that historic subsistence cabins were burned by the government after the establishment of the refuge and the creation of the Izembek Wilderness. Residents have indicated that the cabins were burned without notice and this action removed an important means of subsistence livelihood.</p>	<p>Local residents have expressed strong concerns about the fairness of early actions leading to the designation of the Izembek Wilderness. This viewpoint is well documented in the public comments and in the projects administrative record.</p>
HIST 05	<p>Revise the list of laws in the Draft EIS that are germane to this issue, because there is no reference to the King Cove Health and Safety Act of 1999. By not including this law the Draft EIS downplays the history of prior efforts to build a road.</p>	<p>The King Cove Health and Safety Act of 1999 is described in Section 1.1, with an account of the appropriation of \$37.5 million to provide for a marine-road link between the communities, improvements to the King Cove Airport and improvements to the King Cove Clinic.</p>
HIST 06	<p>The EIS should discuss how the proposed project area is not untrammled and that part of the proposed road right-of-way has existed since World War II. The area has over 35 miles of road and extensive remnant evidence of vehicle use before the wilderness was established in 1980. It is only accessible by land because of the road system which was and is in existence. Congress recognized that the area is only accessible by road in the passage of the Alaska National Interest Lands Conservation Act (ANILCA) and in the passage of the Izembek Land Exchange Act. Congress has pre-approved a road through this wilderness if the Secretary of the Interior finds it in the public interest.</p>	<p>Section 3.3.1 described the existing conditions of land use in the project area, and Section 3.3.3 described existing transportation infrastructure. In the Omnibus Public Land Management Act of 2009, Section 6402 (a), the Congress said: "Upon receipt of notification by the State and the Corporation to exchange non-Federal land for the Federal land, subject to the conditions and requirements described in this subtitle the Secretary may convey to the State all right, title, and interest of the United State in and to the Federal lands." Among the requirements of the Act are preparation of an EIS (Section 6402 (b)) and a determination by the Secretary of the Interior that the land exchange is in the public interest (Section 6402 (d)).</p>
HIST 07	<p>An area resident has requested inclusion of additional information on the environmental impact of historical human habitation in the Izembek study area. Specifically, describe the historical impact that Aleuts have had on the plants, wildlife and habitat of the region.</p>	<p>Sufficient data are not available to describe in any detail the impacts that Aleuts have had on the plants, wildlife, and habitat of the region nor is there any way to separate out the effects of Aleut use from those of other people inhabiting and visiting the area.</p>

SOC Code	Statement of Concern (SOC)	Response
HIST 08	<p>Concern was expressed that the evaluations of the 2003 EIS was dated, and that the 2008 report, "Completions Project, King Cove Access Project Categorical Exclusion Documentation Form and Attachments (Project Number 59791)", should be used since it re-examined the original environmental protections and the effectiveness of these protections when applied to actual road construction and actual operation of the hovercraft from a temporary terminal at Lenard Harbor. This information, including more than 100 required stipulations, were provided to the Service during scoping for this EIS as a basis to develop the design and environmental mitigations for a road across the Izembek National Wildlife Refuge and should have been considered during development of the Draft EIS.</p>	<p>We agree it is useful to review the effectiveness of environmental protections applied to the road construction and operation of the hovercraft under previous projects and environmental reviews. The subject document has been reviewed but does not require modification of the approved King Cove Access Project design or locations of facilities. Therefore, the Completion Project does not require any new or modification of the existing mitigation measures, except to add Federal Highway Administration and Alaska Department of Transportation and Public Facilities to the list of parties notified of any violations.</p>

## NEPA Impact Analysis Methods (IAM)

SOC Code	Statement of Concern (SOC)	Response
IAM	Definitions of impact factors and impact scales. Assess impacts after mitigation considered. Comments regarding the weighing and balancing of factors to reach summary impact judgments.	Category Code; no response required.
IAM 01	The EIS should employ a method that analyzes the impacts on human life to the same extent as for birds and wildlife. Specifically it appears that the Draft EIS provides more analytic attention to impacts to the Tundra Swan, Black Brant, Steller's Eider, bear and caribou than local people and their health concerns. A more balanced analysis would recognize many positive impacts from the land exchange and the road, including:	NEPA requires full disclosure of effects of the proposed action and alternatives to the "quality of the human environment" which refers to "the natural and physical environment and the relationship of people with that environment" (40 C.F.R 1508.14). Economic impacts are assessed in Sections 4.2.3.2, 4.3.3.2, 4.4.3.2, 4.5.3.2, and 4.6.3.2. Impacts to public health and safety are described in Section 4.2.3.4, 4.3.3.4, 4.4.3.4, 4.5.3.4, and 4.6.3.4.
	<ul style="list-style-type: none"> <li>• economic development opportunities;</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• the overall environment by adding tens of thousands of acres of wilderness;</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• increase visitors to the refuge and enforcement ability;</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• the value of the tax dollars save by utilizing the most economical mode of transportation; and</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• value of the lives that are saved.</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
IAM 02	<p>The Service should revise the analytic method in the Final EIS to assess the direct, indirect, and cumulative effects after taking into consideration the required road design standards and additional recommended mitigation measures. The goal would be to assess what are often referred to as "residual impacts" (i.e., those that would occur after mitigation). In addition, the Final EIS should identify a summary impact level category to a resource, which would take into account the mitigation measures.</p>	<p>We agree that NEPA requires analysis of environmental consequences after reasonably feasible and effective mitigation measures have been taken into account. The text is clarified to accord with this point in many sections, notably in Sections 4.3.2.3 and 4.4.2.3 addressing impacts to fisheries under alternatives 2 and 3. Mitigation measures to reduce risks of overharvest have been factored into the impact ratings.</p>
IAM 03	<p>The Service should revise the Final EIS to consistently follow the method defined in the Analysis Methods and Impact Criteria section and the EIS. Uniform and consistent geographic criteria for analyzing local or regional effect should be applied to all the alternatives. Where analysts' judgment is required, this should only include professional judgments. Adequate underlying data to support necessary all impact assessments should be provided.</p>	<p>We agree that the analysis methods should be applied consistently, with a clear analytic basis for all conclusions. Analysts must exercise reasoned judgments, rather than personal bias; and these analytic assessments are subject to review by senior scientists before publication. Impact conclusions were reviewed and augmented when appropriate.</p>

SOC Code	Statement of Concern (SOC)	Response
IAM 04	<p>The EIS methodology should provide a balanced analysis of adverse and beneficial impacts. The most important example is in the nearly exclusive focus on the potential negative impacts of the two alternatives involving the exchange of lands within the Izembek National Wildlife Refuge which would result in the removal of between 131 and 152 acres of designated wilderness. At the same time, the positive benefits from the addition of 44,491 acres of state and King Cove Corporation lands to the Izembek and Alaska Peninsula National Wildlife Refuges and other actions taken by the state and the corporation are downplayed or even ignored. The EIS should place the impacts of the proposed road alternatives within the broader context of all lands that could come under Service management through the proposed action. The result of this unequal analysis is that the Draft EIS does not meet the CEQ guidelines that require a "full and fair" review of the impacts of the proposed action. Positive impacts to be emphasized include</p>	<p>We agree that NEPA requires complete disclosure of environmental effects, direct, indirect and cumulative, whether beneficial or adverse. Accordingly, the resource values and changes in management regimes for lands entering federal management must also be disclosed. The Service disagrees with the final comment that the analysis in the Draft EIS was unequal and does not meet CEQ guidelines. However, where appropriate, additional discussion is provided to more fully describe the resource values of these lands. For discussion of waterfowl staging and wintering areas, see Section 3.2.4. For status and future potential of oil and gas leasing on state lands see Section 3.1.3. For wilderness, see Section 3.3.10.4.</p> <p>The positive benefits that would result from these parcels coming into federal ownership are explained in other comments relating to Section 22 (g) (see REG 10) and the effectiveness of the management plan for the Izembek State Game Refuge to “forestall effects of oil and gas leasing” (see BIO T&amp;E 01).</p>
	<ul style="list-style-type: none"> <li>• the inclusion of Kinzarof Lagoon in the Izembek State Game Refuge, securing management protection for important spring and fall staging area for migratory waterfowl and wintering area for waterfowl.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• avoiding the threat of reasonably foreseeable effects of oil and gas leasing on the state parcel or adjacent off-shore state ownership,</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• the addition of state and corporation lands to the Alaska Peninsula National Wildlife Refuge and Izembek Wilderness in Alternatives 2 and 3, which mitigates impacts from the removal of 131 acres from wilderness and the construction of the road.</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>the wilderness character and values of state parcels, which should be more fully described in Section 3.3.10.2, instead of the single sentence: "These parcels are remotely located and not easily accessible." [Draft EIS p. 3-350].</li> </ul>	<p>As suggested by the State of Alaska in responding to this comment, the Bristol Bay Area Plan for State Lands (April 2005) was again reviewed. The Resource Allocation Tables in the area plan for the King Cove Corporation parcels and the northeast State lands proposed for exchange were reviewed, but no new resource information was identified.</p>
IAM 05	<p>The EIS methodology should clearly indicated whether a summary impact is beneficial, adverse (negative) or absent (no effect), in addition to whether the effect is negligible, minor, moderate, or major.</p>	<p>The Service agrees. NEPA requires analysis of beneficial and adverse environmental consequences of the proposed action and alternatives. Most effects analyses identify adverse effects to a resource, such as habitat loss and disturbance to wildlife. Beneficial effects in such areas as public health and safety are noted. The introduction to effects analysis in Section 4.1 has been revised to clarify this point for a reader.</p>
IAM 06	<p>The EIS methodology should explicitly identify impacts to a particular species or resource at both the local-scale and within a regional context. When viewed beyond the local level, many impact conclusions do not seem to be supported by the data contained in the Draft EIS, with the most glaring being the treatment of the Tundra Swan. Depending on how the spatial extent for a particular resource is defined, the Service can use its discretion to classify summary impacts as major when the impact criteria indicate that the effects are low intensity and/or local in geographic extent. The Service should clearly describe and consistently apply the spatial units of the Izembek National Wildlife Refuge and the Izembek National Wildlife Refuge Complex. This blurred description of geographic areas is confusing, especially when trying to set the "extent" of an effect as being "local" or "regional" or "extended" [Draft EIS p. 4-3].</p>	<p>We agree that the rating scales for geographic extent should be implemented consistently, to achieve summary impacts ratings of major. The scale for rating effects under the geographic extent factor refers to the NEPA project area, which is defined in Section 4.1.1. Additional clarifying language has been provided in Section 4.1.3.</p>

SOC Code	Statement of Concern (SOC)	Response
IAM 07	<p>The EIS methodology should quantify the impacts to resources affected by the alternatives proposed in the EIS. This would help determine the magnitude of potential impacts. In the analysis of effects, the EIS vague terms such as "numerous" and "substantial" without defining what it means by those terms. This results in subjective or arbitrary conclusions. Examples of instances where quantitative estimates are needed include:</p>	<p>For some resources quantitative analyses are possible, as with the example of calculating acres of wetlands affected. For many resources, the state of the science does not permit precise quantitative predictions. Qualitative and semi-quantitative expert panel methods are widespread, and often used for risk assessments. The ratings scales for the EIS are intended to demarcate impacts on a relative scale.</p>
	<ul style="list-style-type: none"> <li>• projections of the frequency and spatial extent of unauthorized access in the designated wilderness,</li> </ul>	<p>See response above.</p>
	<ul style="list-style-type: none"> <li>• the number of animals to be affected and the number or proportion affected in relation to the size of the local and regional breeding populations.</li> </ul>	<p>See response above.</p>
IAM 08	<p>The EIS method for identifying and evaluating the effect of mitigation measures should clarify which features are treated as part of a proposed action and which are mitigation measures. For example, one of the prominent "mitigation" measures (bollard or cable barriers along the proposed roads for Alternatives 2 and 3) is actually a fundamental design feature of the proposed road alternatives (the access barriers will be required by law). This particular feature would be more accurately treated as part of the proposed actions for Alternatives 2 and 3, not as a mitigation measure.</p>	<p>NEPA requires analysis of environmental consequences of the proposed action and alternatives, and specifically those residual impacts after reasonable mitigation measures have been taken into account. NEPA regulations define categories of mitigation, including those that avoid, minimize, rectify, reduce, and compensate for environmental impacts. The CEQ guidance notes that these can take the form of design changes and other permitting or regulatory measures. There is no specific guidance on whether revisions to project design to reduce environmental consequences are to be categorized simply as part of the proposed action, or identified as mitigation measures. The EIS takes the approach to include design features to reduce impacts, in addition to mitigation measures proposed in the EIS. This approach recognizes both types of impact reduction measures.</p>

SOC Code	Statement of Concern (SOC)	Response
IAM 09	The EIS methodology should be revised to clarify the definitions effects and impact criteria, particularly in relation to biological resources [Draft EIS Chapter 4, pg. 4-6, Table 4.1-2]. For example:	The Service agrees that the ratings scales for impacts to biological resources could be clarified. For habitat impacts, the Service agrees that habitat loss merits specific mention as a form of habitat alternation. For behavioral disturbance to wildlife, agree that injury and mortality should be explicitly mentioned. For the definition of "resource character, agree that additional language regarding changes in habitat functions and abundance should be added. New language is now found in Table 4.1-2.
	<ul style="list-style-type: none"> <li>the effect category of habitat alterations should include a specific assessment for habitat loss,</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>the effect of behavioral disturbance to wildlife resources should be expanded to include the effects of injury or mortality in the impact analysis. This is obvious where there is no quantification or categorization of the magnitude of the increased mortality predicted to occur from construction and use of the proposed road.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>a fuller definition should be provided for “changes in resource character” in relation to the intensity levels for the habitat alteration impact criterion.</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
IAM 10	<p>The EIS methodology should be revised to provide clearer definitions of rating scales and the weighing of factors to reach summary impact conclusions. The definitions and criteria lack clear thresholds that move the summary impact from negligible to minor, moderate, or major. The summation of the four factors (magnitude, extent, duration and context) into a summary impact is not treated as formal decision-making rules, but rather as guidelines. Some summary impact conclusions lack analytic clarity, or an adequate basis in the data, rendering them arbitrary. These impact-level definitions could be more clearly stated to reflect how the impact criteria were used to make summary impact-level determinations. [Draft EIS Chapter 2.8, p. 2-51], [Draft EIS Chapter 4, Summary Impact Levels, p. 4-4, second paragraph], and [Draft EIS Tables 4-1, 4-2, and 4-3].</p>	<p>NEPA provides no specific guidance on rating scales or on weighing and balancing factors to reach a summary impact rating. The method used in this EIS reflects widespread practice for many federal agencies. Ratings scales provide relative distinctions, as for most resources the state of the science does not permit quantification. In summing up the ratings of four factors to reach a summary conclusion, the EIS methodology provides guidelines, not formal decision-making rules, nor a numerical weighting for the factor values. There is no hierarchy among the factors, nor a mandatory sequence in which they are assessed in a prescribe order. Instead, the four factors are interactive, and the summary ratings are highly contextual to the particular resource and the individual factor ratings. The rationale statements for summary ratings were reviewed, and where appropriate additional detail was inserted to describe the basis for the rating.</p>

SOC Code	Statement of Concern (SOC)	Response
IAM 11	The methodology for assessing Environmental Justice should be more fully explained, as the terminology of no Adverse Effect is not consistent with the NEPA impact methodology described in Section 4.1 of the Draft EIS.	The terminology for evaluation of Environmental Justice concerns is specifically established in Executive Order 12898, and builds on the NEPA terminology for identifying "adverse" impacts. The Executive Order requires "identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States." As a result, findings that the proposed action or an alternative that would have beneficial effects on human health and the environment would not raise Environmental Justice concerns. Where identified, adverse effects on human health or the environment would be evaluated under the Executive Order for whether they are disproportionate effects on minority and low-income populations in the United States. The language concerning Environmental Justice under each alternative was reviewed, and modified for clarification where appropriate.

## Mitigation Measures (MIT)

SOC Code	Statement of Concern (SOC)	Response
MIT	Suggested measures to reduce the impact of the proposed action and alternatives.	Category Code; no response required.
MIT 01	The EIS should examine accountability for mitigation measures, i.e. requirements for development and implementation, as well as measures to be taken if mitigation is not applied or proves ineffective.	NEPA and the provisions of the Act require identification mitigation measures, and this includes an assessment of the likely effectiveness of these measures. A monitoring plan provides for a structured program of on-going observation and evaluation of impacts to the environment. Under the Act guiding this EIS, when the EIS is completed, an enforceable mitigation plan would be prepared, if the Secretary of the Interior determines a land exchange is in the public interest. Appendix F has been revised to better describe responsibilities for implementing mitigation measures and likelihood that they could be implemented.

SOC Code	Statement of Concern (SOC)	Response
MIT 02	The EIS should more fully describe, clarify, or examine the effectiveness of general mitigation measures, including:	As noted in Section 2.7, NEPA requires thorough analysis of mitigation measures to avoid, reduce or compensate for environmental effects. CEQ guidelines also require that the likelihood of successful implementation of mitigation measures be examined. In addition, the Act requires development of an enforceable mitigation plan. The EIS examines likely effective mitigation measures associated with all action alternatives. If the Secretary of the Interior determines the land exchange is in the public interest, a more detailed enforceable mitigation plan would be developed concurrent with negotiations of the land exchange agreement and permit conditions. This EIS complies with provisions of Section 106 of the National Historic Preservation Act; field survey work was conducted by the Service in the summer of 2012. Any additional compliance activities regarding cultural resources can be added to the enforceable mitigation plan, included in the land exchange agreement and included in the patent.
	<ul style="list-style-type: none"> <li>• Revisions to ensure that mitigation measures in Appendix F are consistent, complete, and firm commitments that would, in fact, reduce the level of adverse impact to the level determined within the EIS, or would be developed after the project is approved. The Service should consult with the and the state to ensure the mitigation measures in the Draft EIS are effective.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Consolidate the specific mitigation measures considered for each alternative, and include a means of documenting the effectiveness of that mitigation. List all of the mitigation measures into a table to make it easier to read.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Verify the effectiveness of mitigation measures described as being completed after the EIS process, because the EIS assumes the benefits of these mitigation plans before they are even developed.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• In regard to the Steller's Eider, review the known mitigation measures that will be applied to construction, operation, and travel on a road located on lands that could be exchanged under in this EIS to more clearly identify whether additional site specific mitigations, a Biological Assessment, or Biological Opinion is needed for Steller's Eider.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Fulfill the Service's Section 106 responsibility to identify, evaluate and assess adverse effect and mitigate, as appropriate, potential or designated National Register of Historic Properties prior to their action (i.e. the land exchange). It appears that these mitigation measures [Draft EIS Page 4-205, Sec. 4.3.3.8 Mitigation] would apply to the state should the land exchange be approved by the Secretary of the Interior. An intensive survey could be required as mitigation through a Section 106 agreement in accordance with 36 CFR Part 800.</li> </ul>	See above response.
MIT 03	The EIS should more fully evaluate the design and effectiveness of the cable barrier system including:	See response to each of the sub-components of this statement of concern.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The mitigation measures identified in the Omnibus Public Land Management Act of 2009 will not minimize the adverse impacts of the road corridor on adjacent refuge lands, especially a cable barrier or other physical barrier on each side of the road. It is highly likely that if a road is built some users will attempt to leave the road to access wildlife on the refuge.</li> </ul>	<p>The concern expressed by the commenter regarding all-terrain vehicle incursions beyond the barrier, has been expressed in Chapter 4 for Alternatives 2 and 3 within the Hydrology assessment, Terrestrial and Aquatic Plant Communities assessment, Wetlands assessment, Birds assessment, Land Mammals assessment and the Threatened and Endangered Species assessments.</p>
	<ul style="list-style-type: none"> <li>A barrier along the road will serve as a movement barrier to wildlife such as bears and caribou, and thus may have an adverse impact on wildlife.</li> </ul>	<p>The concern that the barrier could restrict wildlife movements was initially discussed with the assessment for caribou and wolves, and has since been added to the assessment for bears.</p>
	<ul style="list-style-type: none"> <li>Local subsistence users should be consulted on the design of the barrier system that will be placed on both sides of the road to incorporate knowledge on caribou movements in the area.</li> </ul>	<p>Information regarding caribou movements was obtained from available literature and local subsistence users were afforded the opportunity to provide local knowledge through the public review process, during public meetings and through cooperating agencies such as the Tribes and local governments.</p>
	<ul style="list-style-type: none"> <li>The barrier system should be placed on the boundary between the state and federal ownership to provide maximum space for caribou to avoid the road when travelling inside the barrier system.</li> </ul>	<p>For analysis of this EIS, the typical section shows the barrier 10 feet outside toe of fill slope or ditch. Moving the barrier to the parcel boundary could compromise resource values between the barrier and the road, such as vegetation, soils, and hydrology. The final location of the barrier will be determined if the Secretary of the Interior determines the proposed land exchange is in the public interest and the project goes to final design for construction.</p>
MIT 04	<p>The EIS should evaluate additional specific mitigation measures or monitoring for wildlife including:</p>	<p>See response to each of the sub-components of this statement of concern.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Seasonal limitations on human activities near nesting trumpeter swans or other sensitive resources during critical life cycles periods. Mitigation measures considered in the Final EIS should state [Draft EIS Appendix F Page F-8, Breeding Bird Surveys] that if nests or young are found, construction will stop immediately and the Service will be notified. Construction may not continue until the Service has advised the applicant on the appropriate course of action, which could include no construction until nests hatch or chicks fledge, continued construction with trained monitors in place, or continued construction with no monitors needed. [Draft EIS F-6]. Mitigation measures considered in the Final EIS should state [Appendix F Page F-6 B. Other disturbances: ii] that if Service Personnel are not available, the contractor will be required to conduct the swan surveys as per the Service survey protocols.</li> </ul>	<p>The last paragraph in Section 2.7 states that the enforceable mitigation plan, identified in the Act, would be developed if the Secretary of the Interior determines a land exchange is in the public interest. Detailed descriptions of the mitigation measures and responsibilities for enforcement will be provided in that plan. Appendix F has been revised to provide additional information.</p>
	<ul style="list-style-type: none"> <li>There should be a mitigation measure that would require surveys to determine whether pupping occurs in haul outs near the Cold Bay dock, including Kinzarof Lagoon (Appendix F, Mitigation Measures, Marine Mammal Protection Plan) [Draft EIS Chapter 4, Page 4-365, Sec. 4.6.2.6, Paragraph 4]. Measures to minimize disturbance to harbor seals during the critical pupping season (early May through early July) should be developed if construction noise is likely to affect harbor seal pupping.</li> </ul>	<p>No edits were made in response to this comment. Concerns related to harbor seal pupping would be addressed in a detailed Marine Mammals Protection Plan if a land exchange/road alternative is selected, the Record of Decision is issued, and the Secretary of the Interior determines the proposed land exchange is in the public interest.</p>

SOC Code	Statement of Concern (SOC)	Response
MIT 05	If such scientific proof is produced showing detrimental effects to wildfowl populations, road use should consider adaptive management and restrict use during the critical times only. Blanket long term closures should not be allowed without a preponderance of scientific proof that such closures are warranted. Hunting and access regulations could be used to address other concerns resulting once the road is built; but should not be so onerous to deny reasonable use of the areas available, especially by local residents for subsistence uses.	No edits were made in response to this comment. If the land exchange occurs to allow the road construction, road closures and restrictions would be addressed within an enforceable mitigation plan.
MIT 06	All the precautions, safeguards and use stipulations that the Service will force or enforce on the new road should be sufficient to allow it to proceed, and prevent further disruption, destruction, and irritation to wildlife.	No edits were made in response to this comment. See response to comment MIT 05 above.
MIT 07	The Final EIS should include information from the outcomes of the surveys and required mitigation measures of the King Cove Access Project (Record of Decision 2004). Assessing these measures would verify whether previous required mitigation measures are being implemented and their effectiveness. Examples include the assessment of Steller's Eider's response to hovercraft operations, assessments of hydro-acoustic impacts from hovercraft operations, Tundra Swan surveys conducted at the beginning of each construction year, and whether or not spill equipment was installed at hovercraft launches.	Information from the outcome of mitigation measures from the 2003 EIS has been used where appropriate and to the extent they were completed and available. For example, the assessment of Steller's Eider's response to hovercraft operations was used and cited, but the assessment of hydroacoustic impacts from hovercraft operations has not been completed. Revisions have been made to incorporate data from Tundra Swan surveys and use of spill equipment at hovercraft sites.
MIT 08	Paving the road from King Cove to Cold Bay would mitigate the adverse impacts of dust on vegetation from a dirt road.	No edit has been made in response to this comment. The Act, referenced in Chapter 1, specifically states the road would be a single lane gravel road, if the Secretary of the Interior determines the land exchange is in the public interest.

SOC Code	Statement of Concern (SOC)	Response
MIT 09	In regard to potential adverse impacts to fish populations resulting from new access to streams crossed by the roads, the Service should revise the EIS text to reflect mitigation measures including appropriate adjustments of bag limits and open seasons by the Alaska Board of Fisheries and the Federal Subsistence Board for harvesting from these streams with new access. This should also include information, education, and enforcement strategies. [Draft EIS Chapter 4, page 4-131, section 4.3.2.3, paragraph 4]	As described in Section 2.7, the enforceable mitigation plan identified in the Act would be developed if the Secretary of the Interior determines a land exchange is in the public interest. Detailed descriptions of the mitigation measures and responsibilities for enforcement will be provided in that plan." The commenter's suggested language has been added to Section 4.3.2.3 and 4.4.2.3.
MIT 10	Reexamine mitigation measure A(ii) which attempts to prevent uncontrolled vehicle access to Izembek. A public boat launch will enable local residents to access areas of upper Cold Bay for fishing and hunting activities by water access, instead of vehicle land access. In addition, the Draft EIS has not accounted for the city costs associated with preventing public use of the boat ramp. Remove this mitigation measure in this section and other appropriate sections of the Draft EIS. [Chapter 4, Page 4-39, Sec. 4.2.2.6, Paragraph 7]	Mitigation Measure 11 is entitled "Uncontrolled Motorized Access" and is derived from the 2003 EIS. Section A(ii) addresses the prohibition of public use of the hovercraft ramp. Current law enforcement capacity is described in Section 3.3.4, and has been updated in the EIS. As responsibility for implementing most mitigation will fall to the State of Alaska as the landowner of the road corridor, it would be up to the State of Alaska to determine the most cost effective means of implementing mitigation measures identified in the enforceable mitigation plan, should the land exchange be approved.
MIT 11	Monitoring plans for wildlife species such as caribou, wolverine, and other furbearers should be based on a scientific need as determined by the responsible managing agency. The Service could consider entering into a cooperative agreement with the King Cove Corporation to provide environmental monitoring activity along the road system.	No edit has been made in response to this comment. Administrative procedures used by the Service to conduct monitoring activities are beyond the scope of this EIS.

SOC Code	Statement of Concern (SOC)	Response
MIT 12	<p>The EIS should consider the adequacy of measures to enforce regulations, and whether enforcement could be improved by the Service to entering into a cooperative agreement with the King Cove Corporation to provide law enforcement.</p>	<p>As described in the EIS, the ability to enforce regulations is one of the major concerns of the Service. It is not likely that the King Cove Corporation could provide law enforcement due to state and federal laws regarding the provision of law enforcement services. The King Cove Corporation and/or other local institutions may be able to assist in providing mitigation services. As responsibility for implementing most mitigation will fall to the State of Alaska as the landowner of the road corridor, it would be up to the State of Alaska to determine the most cost effective means of implementing mitigation measures identified in the enforceable mitigation plan, should the land exchange be approved.</p> <p>In addition, a cooperative agreement for law enforcement with King Cove Corporation or other local entity would likely require a commitment of personnel and funding over time. The Anti-Deficiency Act (31 U.S.C. §1341) states in part that an officer or employee of the United States Government may not make or authorize an expenditure or obligation exceeding an amount available in an appropriation or fund for the expenditure or obligation nor involve the United States in a contract or obligation for the payment of money before an appropriation.</p>
MIT 13	<p>Mitigation measures should be applied consistently on the land transferred to the state for road construction and on lands administered by the Service associated with those 50 miles of existing roads in the Izembek National Wildlife Refuge and the Alaska Peninsula National Wildlife Refuge, notably in the case of invasive species prevention measures.</p>	<p>As identified in Appendix F, an invasive species management plan would be part of the enforceable mitigation plan should the Secretary of the Interior find the land exchange in the public interest. Implementation of similar actions on the existing road and trail system within Izembek National Wildlife Refuge area would be ideal but would be subject to the availability of funds appropriated by Congress and Service priorities.</p>

SOC Code	Statement of Concern (SOC)	Response
MIT 14	<p>The Service should evaluate options for effective road signage as a means of promoting compliance with restriction on uses of the road. The Service should consider a road signage program similar to the one being used by the National Park Service in Denali National Park and Preserve to inform the public of temporary closures in nearby habitat, rather than closing the entire state-owned road corridor to several classes of users.</p>	<p>Appendix F "Access and Other Disturbances" addresses signage. The Omnibus Public Land Management Act of 2009 (Act) (Public Law 111-11, Title VI, Subtitle E) is shown in Appendix A. It limits the road to non-commercial uses, though taxis, commercial vans, and shared rides would be permitted.</p>
MIT 15	<p>In order to develop adequate mitigation measures, the Service should undertake on-site wetland delineation and functional assessment this field season for both road alternatives. The EIS should include appropriate mitigation measures in regards to wetlands, and not postpone development of these measures until after the EIS is completed, as suggested in the Draft EIS [Draft EIS Chapter 4 Page 4-125 Section 4.3.2.2 Paragraph 16, Mitigation Measure]. Restoration of old, previously existing Service "trails" through the refuge, using tundra salvaged during the construction of the proposed road connection, should be considered.</p> <p>This wetlands mitigation proposal will not only reclaim seriously rutted and degraded refuge habitat, but also provide a perfect use for the tundra vegetation and soils that would otherwise have to be stripped and disposed of to construct the proposed road.</p>	<p>See COOP 02; we are not obligated to conduct an on-site wetland delineation and functional assessment. The Service is not the permit applicant. The wetland analysis conducted for the EIS is sufficient for the Service's needs to assess a land exchange.</p>

SOC Code	Statement of Concern (SOC)	Response
MIT 16	<p>The Draft EIS does not address mitigation costs associated with wetlands and construction of bollard-chain road barriers. Another important category of cost missing from Draft EIS discussions is the cost of mitigation. There are at least two major components. First, is the cost of mitigating off-road access. A barrier installed along the length of the roadway on both sides will be used to prevent vehicles from accessing the Izembek National Wildlife Refuge and Izembek Wilderness lands adjacent to the road. Two barrier types are being considered for this project: a chain barrier and a bollard barrier. Either involves a significant expense. The second mitigation cost is associated with wetlands. Alternative 2 would involve the fill of 3.8 wetland acres, 2.4 for Alternative 3. There is no reason why the Aleutians East Borough would be exempt from this requirement. Multiplying these unit costs of mitigation by road miles and wetland acres filled, annualizing both barrier and wetland cost over the life of the project and then discounting yields a present value cost estimate of \$10,152,515 for Alternative 2 and \$10,695,748 for Alternative 3.</p>	<p>Mitigation cost of the bollard barrier for Alternative 2 is included in the cost estimate for road construction and is approximately \$4.1 million. Mitigation cost of the bollard barrier for Alternative 3 is included in the cost estimate for road construction and is approximately \$4.4 million. Compensatory mitigation of wetlands is not addressed in the EIS; this would be addressed in the U.S. Corps of Engineers 404 wetlands permit application process.</p> <p>Text has been revised in Sections 2.4.2 and 2.2.3 in the 'Cost' sections.</p>

## Physical Resources (PHY)

SOC Code	Statement of Concern (SOC)	Response
PHY	General comments on the impacts to the physical environment from road construction, operation, and maintenance, including cumulative impacts associated with other development around the refuge.	Category Code; no response required.
PHY PHY 01	Revise impact analyses of Alternative 1 of Noise and Geology and Soils to reflect no hovercraft operation.	The impact analysis of Alternative 1 has been modified due to the Aleutians East Borough's decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation and potential effects on noise and geology/soils.
PHY PHY 02	Comments requested clarification and additional information on risks associated with volcanoes, including:	Text in Section 3.1.3.8 pertaining to volcanic hazards has been modified. Text in Section 3.1.3.8 has been modified to include a discussion of volcanic ash air-fall dispersion dynamics.
	<ul style="list-style-type: none"> <li>Explanation of the specific reason for using 30 miles as a key distance from volcanoes in the context of potential hazards affecting the project area,</li> </ul>	The reason for using 30 miles as a potential hazard is because that is the approximate distance from the volcanoes to the project area.
	<ul style="list-style-type: none"> <li>Insert updated statement: "The Aleutian Arc contains 52 currently active volcanoes, and many more that are dormant." [Draft EIS Chapter 3, Page 3-16, Sec. 3.1.3.8, Paragraph 2, presently states 57 volcanoes are active].</li> </ul>	Comment inserted.
PHY PHY 03	Commenters requested revisions to the analysis of seismic hazards:	Text in Section 3.1.3.8 pertaining to earthquake hazards provides an explanation of earthquake magnitude. Text in Section 3.1.3.8 has been modified.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Quantify the statement regarding earthquakes of “significant magnitude” with a statement explaining what magnitude is considered to be significant in this context.</li> </ul>	Statement deleted.
	<ul style="list-style-type: none"> <li>Insert a figure showing the relationship of Shumagin Seismic Gap to the study area. This would be useful since it is a main focus of the geologic hazards section.</li> </ul>	Location description added to text in Section 3.1.3.8.
PHY PHY 04	Revise text to assess additive effects of land elevation, rate of sea-level rise, and tectonic subsidence and uplift to risks to the road and surrounding land.	The additive effects of land elevation, rate of sea-level rise and tectonic subsidence and uplift were determined to be negligible for all alternatives. While the impacts of sea-level changes due to tectonic subsidence and uplift are important and may be major, this EIS is identifying the contributions to hydrology impacts that are related to this specific project.
PHY PHY 05	Review consistency of impact analysis on noise and cumulative effects for construction and operation of a ferry terminal under Alternative 5 in relation to roads under Alts 2 and 3. [Draft EIS Page 2-56, Noise/Cumulative Effects]. These should all be negligible.	Noise associated with the construction of a ferry terminal, specifically the pile driving activities, resulted in a moderate effect on noise during the construction phase. Pile driving would have a finite, short-term duration. Pile driving activities would not occur for Alternatives 2 and 3. A key difference in the overall effects, between the road alternatives and the ferry alternative, lies in the differences in the direct effects from operation and maintenance. The overall minor effect for Alternatives 2 and 3 is based on the road noise that would occur at frequent intermittent episodes (perhaps 6-13 times per hour) over the life of the project. While under Alternative 5, although the ferry noise would also be medium in magnitude, long-term in duration, local extent, and common context, it would occur only during the six trips per week, supporting the negligible overall effect. Impact assessments were reviewed and found to be consistent.

<b>SOC Code</b>	<b>Statement of Concern (SOC)</b>	<b>Response</b>
PHY PHY 06	Clarify conclusions regarding geology and soils. [Draft EIS Page 4-106 Geology and Soils]	The Geology and Soils conclusion has been modified to clarify the basis for this conclusion.

## Physical Resources – Climate & Air Quality (PHY AQ)

SOC Code	Statement of Concern (SOC)	Response
PHY AQ	Comments related to air quality impacts (criteria pollutants) and emission of greenhouse gases; comments related to climate change impacts.	Category Code; no response required.
PHY AQ 01	Building the road could contribute to global climate change and increased greenhouse gas emissions, which cause detrimental effects to the ecology and wildlife in Izembek. Specific comments include:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>• Dirt and fumes introduced into the environment creates dirty snow that could exacerbate global warming.</li> </ul>	Two sentences were added to Section 4.3.1.2 and 4.4.1.2 that acknowledge dirty snow from dirt and vehicle exhaust/soot can affect global warming. Due to the limited vehicle traffic on the road, these impacts would be negligible.
	<ul style="list-style-type: none"> <li>• The analysis should identify the contribution to localized air pollution from equipment burning fossil fuel in construction of the road, as well as the vehicles that might use the road. Non-local degradation of land and water from fossil fuel extraction should be examined.</li> </ul>	The analysis does include the contribution from localized air pollution from construction equipment and vehicles using the road. This information is presented for construction under the Heading "Direct Effects and Indirect Effects from Construction" in Sections 4.2.1.2, 4.3.1.2, 4.4.1.2, 4.5.1.2, and 4.6.1.2 and from operation in Tables 4.2.1-2, 4.3.1-3, 4.4.1-3, 4.5.1-2, and 4.6.1-3. The contributions to climate change are expressed in units of carbon dioxide equivalents and are based on the air pollution numbers calculated for the air analysis in Sections 4.2.1.1, 4.3.1.1, 4.4.1.1, 4.5.1.1, and 4.6.1.1. Non-local degradation of land and water from fossil fuel extraction was not examined because the increase in demand from vehicles using the road would not be measurable compared to existing demand of existing fossil fuel extraction activities.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Applying the Draft EIS definitions and considering the few vehicles that would use the road on a daily basis and the strong winds, it is questionable that an air quality measuring station on the road would be able to provide any meaningful measurement meeting the assumed overall or cumulative impacts as minor effect. [Draft EIS Page 2-52 Alternatives 2 and 3]</li> </ul>	<p>The minor effects determination is based on emissions from both vehicle combustion and road dust. Consistent with the effects definitions in Section 4.1 the effects from road dust alone are more than negligible because the emissions (road dust) can be observed. No edits have been made in response to this comment.</p>
PHY AQ 02	<p>Climate change occurring on a global scale can affect the project area. Specific comments include:</p>	<p>It is agreed that climate change impacts such as ocean acidification, sea ice decline, and coastal erosion will have an effect on wildlife. In Section 4.2.1.2, these types of climate change impacts are summarized, and it is further explained that carbon dioxide equivalent emissions are the surrogate used to quantify climate change impacts, including the ones mentioned above. An additional sentence has been added to Section 4.2.1.2 that summarizes how ocean acidification, sea ice decline, and coastal erosion can affect wildlife. Specific project-level impacts to wildlife cannot be determined since climate models are not accurate enough to predict these at a project-level.</p>
	<ul style="list-style-type: none"> <li>Climate change is causing the oceans to acidify, resulting in organisms such as corals, crabs, sea stars, sea urchins, and affecting the basic functions of fish, squid, invertebrates, and other marine species, including detrimental effects on metabolism, respiration, and photosynthesis, which can thwart their growth and lead to higher mortality. Because of its serious impacts on so many species, ocean acidification threatens to disrupt the entire marine food web.</li> </ul>	<p>See response above.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The rapid decline in arctic sea ice is one of the most striking and visible indicators of global climate change, and sea-ice loss is having profound impacts on wildlife in the sub-Arctic and Arctic. Sea ice is critically important for numerous species including ice seals, sea ducks, whales, and invertebrates, all of which depend on sea ice for important life processes such as feeding, breeding, giving birth, rearing young, resting, and sheltering.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>Arctic and sub-arctic shorelines are eroding at an accelerating rate due to the combined effects of sea-ice loss, increasing sea-surface temperatures, increasing terrestrial permafrost degradation, rising sea levels, and increases in storm power and corresponding wave action. Increasing coastal erosion jeopardizes species that use coastal habitats such as the Izembek National Wildlife Refuge.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>Alternatives 2 and 3 propose road corridors through a narrow isthmus between Izembek and Kinzarof lagoons; however, the Draft EIS fails to consider potential inundation and erosion of this land due to the very real and measurable threat of sea-level rise. This will have substantial impacts on the maintenance and viability of the proposed road system, especially those sections that must be located near tidewater.</li> </ul>	It is agreed that Alternatives 2 and 3 could be affected by climate change, particularly sea level rise and coastal erosion. Sections 4.3.1.2 and 4.4.1.2 have been revised to acknowledge that potential.
PHY AQ 03	Revise the rating of Air Quality effects in Alternative 2 to negligible: low intensity, localized, and does not affect unique resources. [Draft EIS Page 4-95 to 4-99, See page 4-4]	No edits have been made in response to this comment. Effects are considered to be greater than negligible because isolated occurrences of increased particulate matter due to fugitive dust (on dry days) may have a moderate effect on air quality.

## Physical Resources – Environmental Contaminants & Ecological Risk Assessment (PHY CON)

SOC Code	Statement of Concern (SOC)	Response
PHY CON	Comments related to the possible accidental release of hazardous materials, existing site contamination, or the need for an ecological risk assessment.	Category Code; no response required.
PHY CON 01	Revise impact analysis of Alternative 1 to reflect that there would be no hovercraft effect on hazardous materials. [Draft EIS Page 4- 20-21]	Text in Section 4.2.1.5 has been revised to address this comment.
PHY CON 02	Confirm the location data for the AT&T Alascom Cold Bay Earth Station and Camp site [Draft EIS Page 3-26, Figure 3.1-4] to determine if it does fall within one of the proposed land transfer areas, and discuss in the section titled “Known Contamination on Lands Proposed for Exchange” on page 3-29.	Location of Site #2-AT&T Alascom contaminated site was checked based on information from Alaska Department of Environmental Conservation Contaminated Sites database. Based on latitude and longitude coordinates of site, the contaminated site is not within an exchange parcel. Confirmation of site location would require ground-truthing during construction phase, if the Secretary of the Interior determines a land exchange is in the public interest.
PHY CON 03	Reconsider whether continuous post-construction monitoring for hydrocarbons and turbidity upstream and downstream for three years is excessive. [Draft EIS Page 4-131, Section 4.3.2.3, paragraph 1, sentence 4]	No edits were made in response to this comment. The general descriptions of some of the mitigation measures for this EIS were adopted from the 2003 EIS for analysis purposes. Based on public comments, additional information has been provided in Appendix F. If the Secretary of the Interior finds the exchange in the public interest final mitigation measures would be developed as part of the enforceable mitigation plan required by the Act. Specific magnitude and duration of post construction monitoring would be determined and required by regulatory agencies.

SOC Code	Statement of Concern (SOC)	Response
PHY CON 04	In discussing the environmental consequences of Alternatives 2 and 3, expand the analysis to include impacts to wildlife, water quality, air quality and wetlands from the potential for oil and fuel leaks and spills, discarded litter, human waste due to the lack of toilet facilities, and chemical transportation spills from the road.	Revisions have been made in Sections 4.3.1.5 and 4.4.1.5 to identify potential environmental impacts to the biological and physical resources noted in the comment.
PHY CON 05	Include an analysis of potential environmental remediation of the contaminated lands on Sitkinak Island. Environmental remediation must take place prior to transferring title of those lands to the state; cleanup efforts would need to commence as soon as possible.	As stated in Appendix B, the proposed solution is for the Coast Guard to survey and retain the small area with the contaminated buildings and soil, including any area needed to account for migration of the contaminated plume into adjacent soils. This contaminated parcel would be excluded from the conveyance to the State of Alaska until the cleanup has been completed. Then, the retained parcel could be conveyed to the State of Alaska. An analysis of remedial options and costs is beyond the scope of study.
PHY CON 06	Alternative 5 includes construction and operation of a ferry terminal and a ferry vessel. Since this is considered negligible [in terms of hazardous materials risks], the effects of Alternative 2 and 3 should also be negligible. [Draft EIS Page 2-55 Hazardous Materials/Cumulative Effects]	The summary table in Chapter 2 and the text in Sections 4.3.1.5 and 4.4.1.5 regarding hazardous materials have been revised.

## Physical Resources – Hydrology (PHY HYD)

SOC Code	Statement of Concern (SOC)	Response
PHY HYD	Comments about potential hydrological changes from the proposed road construction or operation.	Category Code; no response required.
PHY HYD 01	The anadromous fish streams crossed by the Southern Road Corridor or the Central Road Corridor are "unique" because they would be removed from the Izembek Wilderness. Anadromous fish streams located in the Mortensens Lagoon Parcel should also be considered "unique" since they will become part of the Alaska Peninsula National Wildlife Refuge.	No edits have been made in response to this comment. Both isthmus and Mortensens Lagoon anadromous streams are considered "unique" because they provide spawning and rearing habitat for salmon species associated with Essential Fish Habitat established under the Sustainable Fisheries Act, as discussed in Chapter 3 and displayed on Figure 3.2-9.
PHY HYD 02	The Final EIS should clarify that the information presented on "Hydrology/Hydrologic Processes" is derived from topographical maps prepared by the United States Geologic Survey at a 1:63,360 scale, which are inadequate for characterizing the integrated ground and surface hydrology of the isthmus. Additional analysis should identify the effects of bisecting subwatersheds with the road alternatives.	No edits have been made in response to this comment. Section 3.1.4.2 already states that the hydrologic boundary that bisects the isthmus area was derived from 1:63,360 topographic maps. Additional analysis at a subwatershed level within the isthmus is beyond the scope of this EIS.

SOC Code	Statement of Concern (SOC)	Response
PHY HYD 03	Address the impact of the road on natural hydrology and drainage patterns, including:	Revisions to Sections 4.3.1.4 and 4.4.1.4 have been made to recognize the potential for the natural hydrology to be affected by the placement of fill for road construction. These effects have also been identified within the wetland sections (4.3.2.2 and 4.4.2.2). Cross drainage structures are addressed in the road design (Appendix E). As the analysis is based on a 35 percent road design, the effectiveness of any particular cross drainage structure cannot be addressed within this document. The intent of the cross drainage structures is to maintain localized drainage patterns. Mitigation measures within Appendix F identify the need for hydrologic/structure monitoring to ensure cross drainage structure effectiveness.
	<ul style="list-style-type: none"> <li>• Address how the impact of a road may extend many feet (50 to 100) into the land on either side of a road. The road can create a dam to water flow and cause flooding on one side and drying out on the other.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• Address the consistency in characterization of whether cross drainage structures are effective in maintaining localized drainage patterns throughout the document.</li> </ul>	See response above.
PHY HYD 04	[Draft EIS Page 4- 18-19 Hydrology] Revise impact analysis of Alternative 1 to reflect that there would be no hovercraft effect on hydrology.	The description and analysis of Alternative 1 have been modified to reflect the Aleutians East Borough's decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation and the potential effects to hydrology.

SOC Code	Statement of Concern (SOC)	Response
PHY HYD 05	To better assess the effects of the roads alternative on Izembek Lagoon and Kinzarof Lagoon permanent and perennial streams should be mapped for the Final EIS.	Permanent and perennial streams crossed by the two road alternatives are identified in Table 2.4-3. Anadromous streams are identified and mapped within Section 3.2.3.4. In addition, these streams appear on the more detailed wetlands maps (Figures 3.2-7 and 3.2-8). No edits have been made in response to this comment.
PHY HYD 06	[Draft EIS Chapter 3, Page 3-16, Sec. 3.1.3.8, paragraph 1, fourth sentence] Qualify "moderate potential of flooding," including historic tsunami information, and the potential for landslide- and volcano-generated tsunamis.	Section 3.1.3.8, paragraph 1, fourth sentence has been revised to qualify moderate potential for flooding with regards to tsunami effects.
PHY HYD 07	Revise Alternatives 2 and 3 [Draft EIS Page 2-54] to "negligible" or "minor" since thousands of acres of wetland will be exchanged for the 3.8 acres filled and the 162 drainage structures.	No edits have been made in response to this comment. The analysis of hydrology effects of Alternative 2 is addressed in Section 4.3.1.4, which identifies the impact as moderate. The change in ownership of the wetlands that currently exist on the proposed exchange parcels is not considered to be a replacement for wetlands to be filled or affected by drainage structures.

## Proposed Action and Alternatives (PAA)

SOC Code	Statement of Concern (SOC)	Response
PAA	Comments on the proposed alternatives (including “no action”) and their practicality/feasibility, as well as other alternatives to consider. Comments on Preferred Alternative, Environmentally Preferred Alternative.	Category Code; no response required.
PAA 01	The EIS should adequately describe the benefit of the proposed road transportation alternatives to best meet human health and safety needs, including adequate width to accommodate construction of the road, an evaluation of appropriate mitigation measures, and adequate maintenance procedures to ensure ability to travel during winter conditions. [Draft EIS Page 1-9, Sec. 1.5, Paragraph 7].	The Service agrees that NEPA requires full disclosure and analysis of effects of the proposed action and alternatives, including beneficial and adverse impacts. The comment proposed summary conclusion statements for inclusion in Section 1.5, which introduces the scope of analysis and decisions to be made. Conclusions regarding alternatives would not be appropriate in this section and the requested change was not made.
PAA 02	The EIS should disclose that the proposed road alternatives do not provide for safe and reliable surface transportation, because driving at the design speed would require much more time than the 20-minute hovercraft transit and so drivers may drive at unsafe speeds. There are difficulties in keeping even small routes snow free and traversable during winter months, and even with continual maintenance, a 30 mile road from King Cove to Cold Bay would not be routinely open and available for safe travel, particularly for someone with an emergency medical condition.	<p>The Act stipulates that the road would be a single-lane gravel road. The capacity of this design necessitates speed limit restrictions, as referenced in Chapter 2. The commenter is correct that the travel time of the road alternatives is longer than for the other alternatives, as shown in Table 4.2.3-8.</p> <p>A percentage of drivers exceeding safe operating speeds is common for most roads; it is anticipated most drivers will operate at a safe speed.</p> <p>It is anticipated that hazardous conditions could lead to occasional closure of the road, possibly a few days per year; which is not unusual in Alaska. A few days of poor weather during winter months is normal in other areas parts of Alaska. A vehicle convoy for emergency travel, led by front end loaders, is common practice in the Arctic during blizzard conditions.</p>

SOC Code	Statement of Concern (SOC)	Response
PAA 03	<p>The EIS should state that when in service, the hovercraft system successfully completed more than 30 medical emergency evacuations, proving that a marine option sufficiently addressed this problem without compromising the integrity of the Izembek National Wildlife Refuge. The 20-minute hovercraft trip between Cold Bay and King Cove, put in place in 1998, is a much shorter time than it would take to drive a patient over a rough expensive road. Until the Secretary of the Interior makes the public interest finding, it is premature to suggest that the hovercraft is no longer needed.</p>	<p>Full disclosure is the NEPA standard. Travel times for each of the alternatives are included in Table 4.2.3-8. The hovercraft is owned and operated by the Aleutians East Borough; it is the Aleutians East Borough that has made the decision to cease hovercraft operations between the communities of King Cove and Cold Bay.</p> <p>Section 3.3.4.2 summarizes emergency medical evacuations that were provided by the Suna X hovercraft, when it was in operation.</p> <p>Section 3.3.4 discusses medical evacuations. A new section has been added that lists individual perceptions of the service, derived from public meeting comments. Table 4.2.3-8 shows travel times for each of the alternatives. The EIS does not state that the hovercraft is “no longer needed.” It states that the Aleutians East Borough will not resume hovercraft service between Cold Bay and King Cove. They have cited the operational expenses and limits as the reason for this decision. The hovercraft has been upgraded and relocated to Akutan. The Service evaluates each of the five transportation alternatives in meeting the purpose and need, as stated in Chapter 1, leading to selection of a Preferred Alternative and a Record of Decision. For a land exchange to occur, the Secretary of the Interior must find it in the public interest.</p>
PAA 04	<p>The EIS should fully describe the limitations of the hovercraft and other current transit options to provide safe and reliable transportation, including:</p>	<p>Information related to hovercraft operating limitations was provided in the EIS, Section 3.3.3. Information related to the difficulty transporting a patient to the deck of the Cold Bay dock was provided in the EIS, Section 3.3.4.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• limitations on operability during adverse wind (greater than 30 miles per hour) and wave conditions (greater than 10 feet), as the fiscal limitation, due to the excessive expense of operation.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• vulnerability to weather conditions for transit by smaller private boats includes and the great danger of a sick or injured patient having to climb a up to a 30-foot ladder at the Cold Bay dock following a 2 to 3 hour boat ride.</li> </ul>	See response above.
PAA 05	The analysis of transportation alternatives should disclose the impact of weather conditions, including the frequency closures due to weather conditions at the Cold Bay Airport, and the impact of ice conditions in Cold Bay on marine transit (such as the ferry alternative).	Dependability of the modes of transportation is discussed in Section 3.3.3.2, and referenced by alternative in Chapter 4..
PAA 06	The EIS should only evaluate alternatives that are reasonably based on the direction provided in the Omnibus Public Land Management Act of 2009. Those are the road corridor alternatives and the no-action alternative. The remaining alternatives do not meet congressional intent for the purposes of the land exchange. Furthermore, it is questionable whether the water-based alternatives are financially feasible for the communities they are intended to serve. If the marine methods of transportation were adequate to meet the communities' needs or were financially feasible, there would be no need for the state, the King Cove Corporation, Inc., and the federal government to negotiate a land exchange, and go through the legislative and congressional approval processes.	The Omnibus Public Land Management Act of 2009 called for "preparation of an environmental impact statement required under the National Environmental Policy Act of 1969." The regulations implementing the National Environmental Policy Act (40 CFR 1502.14) call for agencies to rigorously explore and objectively evaluate all reasonable alternatives including alternatives not under the jurisdiction of the lead agency. Among other information, projected costs of all the alternatives (updated to include the most current information) are disclosed in Chapters 3 and 4 of this final EIS. Furthermore, considering alternatives other than a road meets some of the requirements of other agencies including the Corps and would be necessary for the Corps to determine the "least environmentally damaging practicable alternative" which is required for the Corps to authorize a road affecting wetlands.

SOC Code	Statement of Concern (SOC)	Response
PAA 07	The EIS should fully examine the operational and lifecycle costs associated with the hovercraft operations including the following. [Note that comments addressing the use of a hovercraft in Alternative 1 are no longer directly applicable, since that alternative is updated to refer to a landing craft-style vessel.]	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>Clarify the constant costs associated with maintenance of the access road to the Northeast Hovercraft Terminal [Northeast Terminal], and the variable costs for annual operating expenses (including details on weekly and seasonal frequency of service, transit route, and harbor to be used [Draft EIS p, 2-27]), yielding a total for the “life cycle costs.” Provide more information on how operational and lifecycle cost numbers were calculated as footnotes to Table 2.4-1.</li> </ul>	Costs and cost assumptions have been outlined and updated in sections 2.4.1 through 2.4.5. Road maintenance costs have been revised for all alternatives. Frequency of service is referenced according to costs throughout the alternatives presented in Chapter 4.
	<ul style="list-style-type: none"> <li>Include the cost of a new replacement hovercraft for Alternative 4, estimated at \$9,000,000, since the hovercraft formerly operated by the Aleutians East Borough is no longer available.</li> </ul>	Replacement cost is included in revised cost estimate.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Provide further discussion of why the costs of the hovercraft operations by the Aleutians East Borough are not practicable, or would be unreasonable, when compared to costs of the road alternatives. Revise Table 4.2.3-6 accordingly.</li> </ul>	<p>Operational and life cycle costs are outlined in Sections 2.4.1 through 2.4.5. Fiscal conditions affecting the Aleutians East Borough are shown in 3.3.2.4, and local fiscal effects are also described by alternative in Chapter 4. Further detail has been added to Chapter 2 to outline the assumptions used in estimating the costs. Conclusions as to the “practicability” of each alternative from the Aleutians East Borough’s perspective have not been included in this EIS.</p> <p>Please note that hovercraft cost estimates now apply to Alternative 4. The Aleutians East Borough has discontinued the hovercraft service and Alternative 1 has been reconfigured to reflect current plans of the Aleutians East Borough. The table has been updated to reflect this change.</p>
	<ul style="list-style-type: none"> <li>• Provide further information of the commitment by the Aleutians East Borough to evaluate weather-related operating conditions at the Northeast Hovercraft Terminal [Northeast Terminal] and the northern reaches of Cold Bay, compared with historical operating limitations at Lenard Harbor and the southern reaches of Cold Bay; revenue generated; the cost of operation; and availability of funding sources to make up projected shortfalls between revenues and costs. As a side note, clarify whether the Aleutians East Borough will nevertheless expend federal tax dollars to construct the Northeast Hovercraft Terminal [Northeast Terminal], since the Aleutians East Borough does not plan to operate a hovercraft. [Draft EIS Page 2-19]</li> </ul>	<p>The Aleutians East Borough has stated in a letter to the Corps (dated February 24, 2012) that if the Secretary of the Interior does not approve the land exchange, the Aleutians East Borough will develop an alternative marine transportation link between King Cove and Cold Bay. Any alternative it develops will use the road to the Northeast Terminal. The Aleutians East Borough has only begun preliminary investigations to evaluate possible options, and is exploring a landing craft. Information requested is not available from the Aleutians East Borough. The current project to complete the road to the Northeast Terminal is a State of Alaska project, not a borough project. According to the Alaska Department of Transportation and Public Facilities project engineers, construction of the hovercraft hanger at the Northeast Terminal has been canceled, but the other infrastructure is still slated for construction.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Include updated information referencing the hovercraft's new de-icing equipment, as well as Aleutians East Borough's capacity to cover the cost of operating it.</li> </ul>	<p>According to the Aleutians East Borough, improvements were made to the hovercraft before moving it to Akutan. This included a de-icing package designed to minimize ice buildup on the engine blades and vessel railings during certain winter periods. The entire package of improvements related to de-icing is estimated to cost approximately \$350,000. The additional cost to operate this equipment would be minimal. Recent news reports indicated that the vessel had a \$1.4 million overhaul and operational costs are estimated at \$2.4 million per year (Joyce 2012). These modifications and costs have been added to the hovercraft alternative considered in this EIS.</p>
PAA 08	<p>The cost estimates for Alternatives 2 and 3 should be modified to reflect the likely costs of road maintenance equipment, which appear to be underestimated. The estimate should account for the likely need for additional equipment, the lifespan and costs associated for acquisition, maintenance, and replacement.</p>	<p>Section 2.4.2 and 2.4.3 'Operations and Maintenance' paragraph has been revised to indicate Alternatives 1 through 4 would require maintenance of 17.5 miles of road from the King Cove airport to the Northeast Terminal. Under Alternatives 1 and 4, it is assumed that existing road maintenance equipment and facilities needed to service the road from King Cove to the Northeast Terminal would be placed in service upon the completion of the King Cove Access project road. No additional equipment would be purchased. Under Alternatives 2 and 3, additional equipment would be required to maintain the additional 20 miles of proposed road between the Northeast Terminal and Cold Bay. Maintenance costs have been updated for all alternatives.</p>
PAA 09	<p>Clarify the status of the completion of the road to the Northeast Hovercraft Terminal [Northeast Terminal], and the relation to the proposed action to extend a one lane road from the Northeast Hovercraft Terminal [Northeast Terminal] to the road system near Cold Bay.</p>	<p>Text has been added to Section 2.4.1 to update the completion status of the King Cove Access Road. The connection of that road to the proposed road is described in Chapter 2. The coordination in timing between completion of the existing King Cove Access Road project, and that of a proposed road alternative cannot be estimated with certainty at this time.</p>

SOC Code	Statement of Concern (SOC)	Response
PAA 10	Revise the EIS to provide a thorough, realistic, common sense evaluation of geographic and seasonal climatic factors impacting the various existing and potential air, water and land transportation alternatives. Analyze whether each alternative is able to provide 24/7/365 transportation of a patient with an emergency medical conditions, and whether each alternative can meet scheduled air service to and from the Cold Bay Airport.	Each alternative is evaluated independently in Chapter 4, according to the stated purpose and need. This includes data such as travel times and reliability of service. The alternatives have been revised, and Alternative 1 has been revised due to the Aleutians East Borough's decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation.  De-icing equipment has been added to the hovercraft described in Chapter 2 (Alternative 4), and maintenance costs revised accordingly. Operating costs are described in Section 2.4.4 and 3.3.2.
	<ul style="list-style-type: none"> <li>• The frequency of hovercraft service should be the same between alternatives 1 and 4 to enable a fair comparison of operating costs.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The Final EIS should include updated information referencing the hovercraft's new de-icing equipment, as well as Aleutians East Borough's capacity to cover the cost of operating it.</li> </ul>	See above response.
PAA 11	The effects table [Draft EIS Page ES-24] must be conformed to reflect changes recommended in these comments, particularly changing the effects on wildlife, cultural resources from major to minor and/or negligible.	The summary of impacts presented in the table in the Executive Summary is derived from the substantive analyses presented in Chapter 4. New data and requests for revised analyses on wildlife are the subject of statements of concern in the BIO WILD category. Comments requesting new analysis in the cultural resources area are found in SER CUL.
PAA 12	The EIS should fully reflect the view of local residents, summed up by the Aleutians East Borough Mayor, that the hovercraft is NOT any kind of solution to our struggles for transportation access. The Aleutians East Borough permanently pulled the hovercraft out of service and is on record that it is not a viable alternative to a road any time of year.	The Aleutians East Borough's action to discontinue the hovercraft service is now described in Section 2.4.1 regarding the No Action Alternative.

SOC Code	Statement of Concern (SOC)	Response
PAA 13	<p>The EIS should clarify that the Aleutians East Borough has removed the hovercraft from service in Cold Bay on the grounds that it is not seaworthy in Cold Bay conditions and not financially feasible to operate. All alternatives need to be revised.</p>	<p>The purpose of the EIS is to fully disclose the environmental consequences of the proposed action and alternatives. It is reasonable to expect that the seaworthiness of the hovercraft, as modified for service in Akutan, would be described as part of evaluating Alternative 4. Additional information on the operability of the modified hovercraft has been incorporated into Section 3.3.3.1 in the subsection on Marine Transportation.</p> <p>The EIS notes that the Aleutians East Borough will not resume hovercraft service between Cold Bay and King Cove. They have cited the operational expenses and limits as the reason for this decision. Alternative 1 has been revised to reflect the best understanding of the existing situation. Alternative 4 includes a replacement, full-service hovercraft, but the potential operator or source of the subsidy is known.</p> <p>The socioeconomic effects of Alternatives 2 and 3 are outlined in Chapter 4, by alternative – they are broken down by category, such as employment, population, and fiscal effects. They are evaluated in this EIS according to the criteria shown in Section 4.1.</p> <p>According to Section 3.3.2.4, the source of the subsidy for hovercraft operations in the past has been the Aleutians East Borough. The part of this comment about “50 percent of demand” is not understood; there are other sources of transportation besides the hovercraft or a ferry, such as air travel. It could not be assumed that all demand for travel between the communities of King Cove and Cold Bay would use any one form of travel.</p>
	<ul style="list-style-type: none"> <li>Alternative 1 should indicate the Hovercraft will not be restarted and the Borough will not commit \$1 million to hovercraft operation.</li> </ul>	<p>See above response.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Alternatives 2 and 3 should evaluate the effect on socioeconomics for the residents of King Cove, which are a major positive beneficial effect for all residents of King Cove and include an additional modifier of “beneficial”.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Alternative 4 should identify the source of the estimated \$2 million annual subsidy that accommodates only 50 percent of the demand for access to and from the Cold Bay Airport with a new hovercraft with an estimated acquisition cost of at least \$9,000,000. Also the estimated cost assumes the AEB hovercraft will be available at no cost under Alternative 4. It will not, and the operational characteristics of AEB hovercraft are now known to not provide either reliable or cost effective operation.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Alternative 5 should identify the construction, acquisition, or operational funding and a perspective applicant who would be willing to cover the estimated annual operating cost of \$2,300,000 to serve only one half of the demand to get to and from the Cold Bay Airport.</li> </ul>	See above response.
PAA 14	Suggestions for modifications of the Alternatives presented in the Draft EIS are:	The Act included the provisions prohibiting commercial use of the road with minor exceptions for shared rides. The Act also directed that the road corridor exchange parcel to be the minimum necessary. Regarding the 35 percent design of the road as the basis for the EIS analysis, this is a standard practice in NEPA work. The situation for this EIS is unusual in that the corridor to be exchange must be defined in order to execute the land exchange. The details of the land exchange corridor would be further negotiated in the land exchange agreement, if the Secretary of the Interior determines that the exchange is in the public interest.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Revise to allow reasonable public access along the road way.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Alternative 3 should include the option of higher use levels for the road to include commercial traffic, and general transportation to the maximum extent possible without negative impacts to migrating waterfowl.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The Service should reexamine its adamant determination that the center line to the 35 percent level firmly fixes the external boundaries of the land to be transferred to the state. The center line developed for the Draft EIS must be flexible so it can be adjusted to protect undiscovered archaeological, historic and cultural sites. Consideration should be given to the selection of the best hydrologic sites for stream crossings to minimize negative effects to Essential Fish Habitat, and avoid bad foundations and other unexpected effects to resources.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Remove the lands within the road corridor from the wilderness designation. Eliminate the wilderness designation for a wider area along the road corridor, say for 1/4 mile each side to total elimination along the corridor if it is found that there would be no real detrimental effects to waterfowl populations.</li> </ul>	See above response.
PAA 15	Suggestions for additional marine alternatives include:	Section 2.2 describes the screening process used to evaluate a wide range of alternatives to meet the purpose and need and to select a set of reasonable alternatives for detailed analysis. The comments provide suggestions for additional marine alternatives. The proposed additions have been considered and set aside from detailed analysis for the reasons reported in Section 2.3.2 and 2.3.4

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• A hovercraft may not be the most fuel-efficient mode to accomplish the EIS purposes, but its replacement by a high-speed hydrofoil or other such vehicle would accomplish the same objective.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Co-purchase an additional hovercraft, and repair the existing one.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Contract with or co-purchase sea ambulances or a fleet of sea taxis and hire captains to run them.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• There is always available in King Cove at least one, and usually several ocean-going vessels which can make the transport to Cold Bay safely in two to three hours in the very worst conditions. The critical need is a breakwater and disembarkation sufficient to protect and accommodate up to a 130 foot vessel and passengers. The US Coast Guard must make provision to certify or otherwise grant permission for transporting passengers by private and unlicensed vessels in emergencies. The US Coast Guard should underwrite whatever safety features are necessary to accomplish emergency transports aboard these vessels.</li> </ul>	See above response.
PAA 16	Suggestions for additional or modified road alignments include:	Section 2.2 describes the screening process used to evaluate a wide range of alternatives to meet the purpose and need and to select a set of reasonable alternatives for detailed analysis. The comments provide suggestions for additional road alternatives. The proposed additions have been considered and set aside from detailed analysis for the reasons reported in Section 2.3.1.
	<ul style="list-style-type: none"> <li>• Build the road right across the Kinzarof spit and just make a short route with a couple little bridges.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Build underground wildlife crossings beneath the road.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Utilize existing roads that were shut down after World War II to the greatest extent practical.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Consider a road alignment that routes around Izembek.</li> </ul>	See above response.
PAA 17	Suggestions for additional aircraft alternatives include:	Section 2.2 describes the screening process used to evaluate a wide range of alternatives to meet the purpose and need and to select a set of reasonable alternatives for detailed analysis. The comments provide suggestions for additional aircraft alternatives. The proposed additions have been considered and set aside from detailed analysis for the reasons reported in Section 2.3.3.
	<ul style="list-style-type: none"> <li>• Station a permanent US Coast Guard helicopter at Cold Bay. A significant, additional consideration to this approach would be that other communities with similar health and safety concerns, as well as near shore marine vessels would also benefit at an equal level with King Cove.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Extend the current runway at King Cove or build a new one that could accommodate PenAir flights. A larger runway could also accommodate tourism to the area.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
PAA 18	Provide adequate medical capacity in the small communities and the ability to wait out the weather as much as possible before transporting patients with medical emergencies. Some suggestions are to use pay incentives to bring medical professionals to the community, contract with a hospital or medical school that would outstation doctors with certification in emergency procedures in the community on a rotating basis; and, for long-range purposes or sponsor local youth who agree to train to become doctors and then return to practice in Cold Bay and King Cove.	Section 2.2 describes the screening process used to evaluate a wide range of alternatives to meet the purpose and need and to select a set of reasonable alternatives for detailed analysis. The comments provide suggestions for additional community-based medical care alternatives. The proposed additions have been considered and set aside from detailed analysis for the reasons reported in Section 2.3.5.
PAA 19	Suggestions for modifying land swap include:	The commenter proposed alternatives to the land exchange. These alternatives are outside of the scope of the EIS since Congress provided guidance on the terms of the land exchange in the Act.
	<ul style="list-style-type: none"> <li>• Consider purchasing the land in question instead of exchanging the land for a road. If the land is available, buy it to consolidate holdings and create buffer zones for Izembek.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• King Cove should give no land into this deal. That land is theirs and they deserve to keep their land. The federal government would still gain 40,000 acres of land, traded for 201.</li> </ul>	See above response.
PAA 20	The Draft EIS should state [Draft EIS Page 1-24 Section 1.6.4 Responsibility for Obtaining Permits paragraph 1 sentence2] that should the Secretary of the Interior authorize the land exchange the State of Alaska, Department of Transportation and Public Facilities would be responsible for obtaining all applicable federal, state and local permits for construction of the road.	The Service agrees; this clarification has been made in the EIS.

SOC Code	Statement of Concern (SOC)	Response
PAA 21	The No Action Alternative (Alternative 1) is the environmentally preferred alternative.	The commenter expresses an opinion regarding the environmentally preferred alternative, but does not provide analytic basis. No change is made in the document.
PAA 22	Comments suggesting the road alternatives are the Preferred Alternative include:	These comments express a conclusion about the road alternatives as the preferred alternatives and provide an analytic rationale. In identifying the Preferred Alternative in the Final EIS, the Service has considered these factors.
	<ul style="list-style-type: none"> <li>Based on the information currently presented in the Draft EIS, it appears that Alternative 3, Land Exchange and Central Road Alignment, may be the environmentally preferable road alternative, because it impacts fewer acres and requires fewer stream crossings.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Alternative 2 (Land Exchange/Southern Road Corridor) should be selected as the Preferred Alternative and the Environmentally Preferable Alternative because it has the fewest miles of road located in the watershed of the Izembek Lagoon complex (i.e. Izembek and Moffat lagoons).</li> </ul>	See above response.
PAA 23	The best transportation alternative for all involved is a ferry out of Lenard Harbor. That is the environmentally preferred transportation alternative.	This comment expresses support for Alternative 5, but does not provide an analytic basis. No change is made in the document.
PAA 24	Although the Draft EIS does not identify a preferred alternative, the analysis in the EIS indicates that Alternative 4, Hovercraft Operations from Northeast Terminal, is likely to be the environmentally preferable alternative.	This comment expresses support for Alternative 4, but does not provide an analytic basis. No change is made in the document.

SOC Code	Statement of Concern (SOC)	Response
PAA 25	<p>The Service needs to explain how in Chapter 2 of the Draft EIS the potentially long list of alternatives was narrowed to 5, and how Alternatives 4 and 5 (hovercraft &amp; ferry) were included because, at least in part, they "addressed" the project purpose. In the analysis of alternatives (Chapter 4), the Draft EIS states that Alternative 1 (no action) does not meet the project purpose. Later in the chapter, the Draft EIS notes that both Alternatives 2 and 3 would meet the overall project purpose of a long-term, available, safe and reliable, year round transportation link between the cities of King Cove and Cold Bay. However, the Draft EIS is silent on this issue for Alternatives 4 and 5 in the environmental impacts chapter. Failure of the Draft EIS to state whether the Service and/or US Army Corps of Engineers believe that Alternatives 4 and 5 meet the overall project purpose is extremely problematic. If Alternatives 4 and 5 do not, then these alternatives presumably cannot be considered the least environmentally damaging practicable alternative if that decision ever needs to be made. The Draft EIS needs to be more transparent in this respect.</p>	<p>NEPA requires analysis of a reasonable range of alternatives to address or meet the purpose and need for the proposed action. Section 2.1 explains the process for development of alternatives. Additional language has been added to clarify that all action alternatives considered had to address, or be capable of meeting the purpose and need for improved access to health care. Alternative 1, the No Action Alternative, is analyzed as a baseline for comparative purposes with the action alternatives, as a requirement under NEPA. This alternative may not meet the purpose and need identified for the project (Sections 1.3 and 1.4).</p>
PAA 26	<p>The EIS should indicate that the Suna-X is being modified by the Aleutians East Borough to withstand strong wave conditions and will be redeployed to provide service between Akutan and the Akun airport. This indicates that the hovercraft is seaworthy under comparable conditions and is affordable to operate. This would lower costs considerably of Alternative 1 and should be reflected in Table ES-2.</p>	<p>The deployment of a hovercraft is discussed in Section 2.4.1 and 2.4.4. Equivalent equipment to withstand ice and other sea conditions is included in Alternative 4. Alternative 1 has been revised due to the Aleutians East Borough's decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation. Table ES-2 has been revised accordingly. The decision to operate the Suna-X at a new location was made by the Aleutians East Borough, as described in Chapter 2.</p>

## Public Involvement and Scoping Process (PUB)

SOC Code	Statement of Concern (SOC)	Response
PUB	Comments on compliance with the NEPA process for public scoping or the public comment period.	Category Code; no response required.
PUB 01	Concern was expressed with how comments from the community are weighted in comparison to comment from the outside of the region. Specifically there is concern that thousands of e-mails from outside of the community will overwhelm the comments of a small number of local residences and influence the decision making process. Residents would like the EIS to convey to decision makers, that the local people are strong advocates for this road.	Local residents have expressed strong concerns that comments from outside the region will overwhelm the local concerns. Section 1.9 outlines the process through which unique and similar comments were incorporated into the EIS. A new Section 1.10 has been added to describe the comment analysis process from the EIS.
PUB 02	Residents of the region expressed concern that the Service will not take into consideration all comments submitted on the Draft EIS when making their recommendation to the Secretary of the Interior.	All comments submitted during the scoping period and during the comment period on the Draft EIS were taken into consideration for the Final EIS. The scoping process is outlined in Section 1.9. A new Section 1.10 has been added to describe the process through which comments on the Draft EIS has been incorporated into the Final EIS.

SOC Code	Statement of Concern (SOC)	Response
PUB 03	<p>The Service needs to address the points raised in scoping comments by the U.S. National Ramsar Committee dated September 29, 2009 (Suzanne Pittenger-Slear Chair, U.S. National Ramsar Chair to Helen Clough, Project). The following points should be addressed: 1) effect of the land exchange on the Ramsar designation boundary; 2) consistency of the land exchange with Ramsar Convention; and 3) whether effects of the land exchange and road would result in delisting [i.e., removing the Ramsar designation].</p>	<p>Revisions have been made in Sections 4.3.2.2 and 4.4.2.2 to describe the effect of the land exchange on the Ramsar designation boundary, the consistency with the Ramsar Convention and the potential for delisting.</p> <p>We stated that if Alternative 2 or 3 is approved, the Service would report the proposed change to the Ramsar Convention and carry out a re-evaluation to determine if the proposed adjustment of the wilderness status for the area within the exchange corridor and the fill of approximately 3-5 acres of wetland within the Ramsar site, would affect the eligibility under the Ramsar criteria.</p>

## Purpose and Need of the Action (P&N)

SOC Code	Statement of Concern (SOC)	Response
P&N		Comments on the purpose and need of the project; including health and safety, quality of life and transportation systems.
P&N 01	Clarify existing transportation options in the Draft EIS. Comments indicated the proposed road is unnecessary because there are other transportation alternatives available to the community. Specifically:	Category Code; no response required.
	<ul style="list-style-type: none"> <li>The Aleutians East Borough began constructing a 17.6 mile road between King Cove and the site of a hovercraft terminal [Northeast Terminal]. The hovercraft is reliable and can perform evacuations much more quickly than a road. More than 30 successful evacuations have been completed, and the hovercraft service has performed as expected. The hovercraft would be more cost effective than the cost of building and maintaining a road, and encourage less emission of greenhouse gases. The hovercraft ride is also much shorter than the drive would be.</li> </ul>	The purpose and need for the proposed action were established by the Congress in the Act. This is a policy statement, and not an empirically derived conclusion on the basis of detailed comparisons of health care access in many or all other remote rural Alaskan communities. Within the confines of the purpose and need established by the Congress, the EIS does assess and compare the environmental consequences of the various alternatives for health care access.
	<ul style="list-style-type: none"> <li>There is a ferry service between the communities of King Cove and Cold Bay.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Both Cold Bay and King Cove have airports for quick shuttle between them.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
P&N 02	The project need is not adequately justified in the EIS; it would serve a small population at huge taxpayer expense and would inflict unjustified environmental impacts.	The purpose and need for the proposed action were established by the Congress in the Act. This is a policy statement, and not an empirically derived conclusion on the basis of detailed comparisons with health care access in many or all other remote rural Alaskan communities. The terms of the Act required a new EIS, not limited by the conclusions of the 2003 EIS. Nevertheless, within the confines of the Purpose and Need established by the congress the EIS does assess and compare the environmental consequences of various alternatives for health care access.
	<ul style="list-style-type: none"> <li>• The population of people who would be using a road would be so small that the expense of building the road cannot be justified to U.S. taxpayers. The road would harm the wilderness, which is the property of all citizens. Ease of access for a very small population who choose to live in a remote area should not be considered sufficient justification for ignoring wilderness designation by building a road that could be impassable for much of the year.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The 2003 EIS found that a road would be detrimental to the refuge; the environmental effects of the road would not be offset by the human benefits.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
P&N 03	<p>The project is needed to address health and safety issues. The 792 residents, visitors, and non-permanent residents of King Cove are in an area classified by the federal government as a "Medically Underserved Area" (an area with too few primary care providers, high infant mortality, high poverty, and/or high elderly populations). The road is necessary to help ensure that people will have access to adequate emergency and safety resources. Many people experience dangerous boat or plane rides to the Cold Bay Airport, or cannot get there at all due to weather; some lose their lives as a consequence. The unreliable transportation to Cold Bay also makes it difficult to keep medical appointments in Anchorage. It was noted that Congress was persuaded of the merits of King Cove's request for safe, reliable and affordable road transportation for its citizens, otherwise they would not have passed the legislation authorizing the land exchange. Many comments noted that a road corridor from King Cove to the all-weather airport at Cold Bay is in the public interest. As it is not only a public safety and but also human rights issue, which should be given the highest priority by the Secretary of the Interior.</p>	<p>In the Act, Congress established a purpose and need for the proposed land exchange as a matter of policy. The Act also directed the Service to prepare an EIS to evaluate the proposed land exchange. The purpose and need as identified in the Act also serve as the basis for identifying a reasonable range of alternatives to be analyzed, as required by NEPA. Public comments and testimony at public meetings on the Draft EIS provided many examples of barriers to adequate medical care under existing transportation options. Section 3.3.4 has been revised to include select public comments that demonstrate safety concerns, and the challenges of access to medical resources.</p>
P&N 04	<p>The project need should not be affected by the Borough's decision to discontinue hovercraft service. The "Sidebar" [Draft EIS page ES-8], stating that the Aleutians East Borough has decided to discontinue operation of the hovercraft that was provided for their use at great expense to the federal government should in no way influence the decision on whether or not to grant the requested road permit.</p>	<p>The purpose and need for the proposed action were established as a matter of policy by the Congress in the Act. The EIS describes the history of previous efforts to address health care access for King Cove, and additional discussion has been added to Section 2.4.1 (Alternative 1) concerning the Aleutian East Borough's responsibilities under the terms of the Corps permit to fill wetlands for the road to the Northeast Terminal. Regarding the legal provisions for disposition of the hovercraft under the grant from the Service for the original purchase, see REG 08.</p>

SOC Code	Statement of Concern (SOC)	Response
P&N 05	The EIS should describe the Service's 1997 King Cove Briefing Report, Izembek National Wildlife Refuge. The Service should reaffirm that public interest finding now and reject the land exchanges.	The Service agrees; this report has been noted in revised language on the administrative history (Section 1.6.2.3) of the project.
P&N 06	The health and safety needs expressed by King Cove residents were fully addressed by the 1998 King Cove Health and Safety Act and the Omnibus Act of 1999. That legislation provided the King Cove community with \$37.5 million to upgrade its medical facilities, build a road connecting the town to a new marine terminal, and purchase a state-of-the-art seaworthy hovercraft to provide regular ferry and emergency medical service between King Cove and Cold Bay. The Act specifically prohibited a road through Izembek's federally-protected wilderness.	In 2009, Congress revisited the need for improved access to health care for the residents of King Cove and directed a new EIS to evaluate a land exchange. The 2009 action of Congress specifically authorized a land exchange if the Secretary of the Interior finds it in the public interest. If the land exchange occurs, a road would be constructed on State lands which would no longer be designated Wilderness.
P&N 07	Comments expressed concern that purpose of the proposed road is not for health and safety, but for personal travel (non-emergency), to establish infrastructure for potential exploration and development of oil leases in the North Aleutian Basin, facilitate commercial fishing and processing businesses, or for commercial hunting guides to gain unprecedented access to the rich habitat within Izembek National Wildlife Refuge.	The comment attributes many motives to the proposed land exchange and road. Congress articulated a purpose and need for the proposed action, and this guides the analysis in the EIS.

SOC Code	Statement of Concern (SOC)	Response
P&N 08	<p>The purpose of the project includes additional quality of life elements not included in the Draft EIS; expand the description of the quality of life needs. The road would enhance many aspects of quality of life, including: saving money on airfare, obtaining mail, visiting natural lands, accessing subsistence lands, attending sporting events, commercial events and fundraisers, creating opportunities for school field trips, recreation, and convenient transportation to visit friends and family, get to bigger cities for business trips and doctor's appointments. Also important to quality of life are the feelings of peace, well-being, and security that would come with reliable transportation between the two communities.</p>	<p>The comment suggests additional examples for the statement of purpose and need referring to quality of life. The EIS has been revised in Section 1.4.2 to include additional examples of quality of life, based on public comments and testimony in the public meetings on the Draft EIS.</p>
P&N 09	<p>The EIS fails to accurately and fully frame whether non-road alternatives meet the purpose and need and it fails to fully address the other statutes that the Service must respond to in deciding this issue. It is unclear why Alternative 1 does not meet the purpose and need, but Alternative 4 would meet the purpose and need.</p>	<p>Congress declared that the purpose of the proposed land exchange evaluated in this EIS was to allow construction of a road to be used primarily for health and safety purposes including access to and from the Cold Bay airport. The need, as described in Section 1.4, is for health and safety, quality of life, and affordable transportation. NEPA requires an analysis of a reasonable range of alternatives to meet the purpose and need, and the Service has concluded that this includes non-road alternatives that would improve access to health care. In the screening process to develop the alternatives, described in Section 2.2, each of the four action alternatives was determined to be capable of meeting the purpose and need and advanced for detailed analysis. The EIS is required to fully disclose the environmental consequences of the proposed action and alternatives, i.e., road and non-road options. On the basis of this analysis, the Service has identified a preferred alternative, taking into account the adverse and beneficial effects of the alternatives on the physical, biological, and social environments.</p>

SOC Code	Statement of Concern (SOC)	Response
P&N 10	Review the purpose and need statement for objectivity. The purpose and need reflects the needs of the project proponents (quality of life and affordable transportation) but does not reflect the needs of agency management mandates, such as biological integrity, diversity, environmental health and wilderness character were not included as project needs.	In the Act, Congress established the purpose of the proposed land exchange as a matter of policy. NEPA does require disclosure of the relevant regulatory framework, including the Service's mandates for managing the Izembek Refuge. These are described in Section 1.6. The proposed change was not made.
P&N 11	The purpose of the project infers that a road would provide highly reliable transportation that would address health and safety issues. However, the proposed road would not provide the reliability of transportation that is inferred due to Alaska weather (including fog, snow, landslides, and earthquakes). The road would create new safety issues, including during emergency evacuations in inclement weather.	In the Act, Congress established the purpose of the proposed land exchange as a matter of policy. NEPA requires disclosure of the environmental consequences for the proposed action and alternatives, including the potential beneficial and adverse effects of the road alternatives on public health and safety. The alternatives are evaluated independently. For example, the EIS shows that while a road is available more often because it can be maintained according to environmental conditions, it also a slower method of travel between the communities. Safety issues are discussed in the Public Health and Safety section 3.3.4- each transportation method has safety risks.
P&N 12	All transportation between the City of King Cove and the Cold Bay Airport can meet the respective safe operating conditions reflected in the design and operational standards for each transportation mode. It is recognized that each transportation mode has different safety operational standards with sea conditions on Cold Bay being a limiting safety factor for the conceptual vessel under Alternative 1, a hovercraft under Alternative 4 and a ferry under Alternative 5. A road under Alternative 2 or Alternative 3 is presumed to have essentially the same capabilities for the purposes of safety.	The screening process for alternatives is described in Section 2.2. The action alternatives have different environmental consequences, including varying capacities to operate under difficult weather and sea state conditions. These differences are analyzed in Chapter 4 for each alternative in turn, generally in the sections on Transportation and Public Health and Safety. No edits were made in response to this comment.

SOC Code	Statement of Concern (SOC)	Response
P&N 13	<p>The hovercraft marine link did not address project needs of health and safety and reliable transportation. The original hovercraft service has proven to be too costly and difficult for maintenance and repair, in addition to the challenge of keeping qualified personnel in the region to operate the craft. The hovercraft is not available on a 24/7 basis; adverse weather often blocks its operation along with aircraft and large local boats.</p>	<p>The purpose and need for the provision of safe and reliable transportation is outlined in the Omnibus Public Land Management Act of 2009 (Act) (Public Law 111-11, Title VI, Subtitle E), and is shown in Appendix A. The EIS represents alternatives in achieving that goal, including road alternatives. The challenges of past hovercraft operations are discussed in Section 1.4 (Need), 3.3.3 (Transportation), and 3.3.4 (Public Health and Safety). Section 3.3.4 has been updated with individual accounts of public safety issues that were contributed at public meetings.</p>
P&N 14	<p>The proposed road fully meets the purpose and need of safe, reliable, affordable transportation. Often the weather does not permit travel by flight to Cold Bay. People can be stranded waiting for the weather to clear enough for flights into or out of King Cove. The proposed road would allow residents to travel between King Cove and Cold Bay (which has a much larger airport) at any time to catch flights to other cities.</p>	<p>The comment expresses support for the road alternatives as fully meeting the purpose and need. No change in the document is required.</p>

## Federal/State Permits, Approvals, Laws, Regulations, and Policies (REG)

SOC Code	Statement of Concern (SOC)	Response
REG	Comments related to legislation, compliance with laws and regulations (including NEPA and Wilderness Act), and the purpose/mission of wilderness and refuge areas, and the details of the land exchange (i.e., numbers of acres). Includes comments associated with the Secretary of the Interior’s decision process. Also includes comments associated with data gaps and incomplete information.	Category Code; no response required.
REG 01	The King Cove Health and Safety Act is central to the history of the actions under consideration in this Draft EIS; however, the summary of pertinent Federal Laws, Regulations, and Policies does not include this law. The EIS needs to take into consideration the King Cove Health and Safety Act, given it prohibits a road through the Izembek National Wildlife Refuge and determined a road was not in the public interest because it would be contrary to the purposes of the refuge.	The King Cove Health and Safety Act of 1999 is described in Section 1.1, with an account of the appropriation of \$37.5 million to provide for a marine-road link between the communities, improvements to the King Cove Airport and improvements to the King Cove Clinic. In the 2009 Act, Congress directed the Service to prepare an environmental review of the proposed land exchange. This more recent statutory direction supplants previously legislation.

SOC Code	Statement of Concern (SOC)	Response
REG 02	<p>Concern was raised that a road through wilderness is incompatible with the purposes for which Congress created the Izembek National Wildlife Refuge. The Service needs to conduct a thorough and objective evaluation of the proposed land exchange and road corridor alternatives in relation to the Service's ability to fulfill its statutory responsibilities and the public interest. The current analysis relies on incomplete, outdated, and biased information and does not assess whether the proposed action fulfills agency mandates and serves the public interest. As highlighted in the Refuge's Comprehensive Conservation Plan, Congress has designated that the refuge be managed to maintain wilderness resources and values, preserve the wilderness character, and provide opportunities for research and recreation. In addition, the refuge was created to fulfill the United States' international treaty obligations (such as the four migratory bird treaties and the Convention on Wetlands of International Importance); to provide for continued subsistence by local residents; and to ensure water quality and quantity within the refuge. It is felt the land exchange and road construction would undermine this mission and the refuge's purpose.</p>	<p>NEPA requires that the EIS provide full disclosure of the environmental consequences of the proposed action and alternatives. This includes analysis of the potential effects on resources managed under the Service's mandates, such as the purposes for which the Izembek National Wildlife Refuge was established. The Service has reached a conclusion regarding the preferred alternative on the basis of this analysis, taking into account the environmental consequences.</p>
REG 03	<p>The Service should revise the EIS to indicate that permanent roads and commercial enterprises are expressly prohibited in designated wilderness areas, as stated in the Wilderness Act of 1964 and ANILCA Section 702 (6). Therefore to construction the road as outlined in Alternatives 2 and 3 in the Draft EIS, the affected areas must be "de-designated" and removed from the Wilderness System. This action is inconsistent with congressional intent and illegal based on the Wilderness Act, which was passed to provide permanent protection to the land and prevent this sort of action.</p>	<p>As the comment notes, Congress provided direction in the Act to consider a land exchange and removal of the minimum necessary corridor from the Izembek Wilderness. Congress clearly expressed this intent and directed this analysis. Congress directed that before the land exchange could occur, the Secretary of the Interior must determine it to be in the public interest.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 04	<p>The Final EIS should be revised to show that the Omnibus Public Land Management Act of 2009 goes against several federal statutes, including the Wilderness Act and the National Wildlife Refuge Improvement Act of 1997. Specifically, the Act undermines national guidance that the Service has set forth, including Fulfilling the Promise, issued in 1999, and the more recent, Conserving the Future: Wildlife Refuges and the Next Generation.</p>	<p>The requested change was not made because Congress has the authority to supersede previous legislation and administrative actions. Congress provided direction in the Act to consider a land exchange and removal of the minimum necessary corridor of land from the Izembek Wilderness.</p>
REG 05	<p>The EIS needs to be amended to include a compatibility review with the opportunity for the public to comment on the analysis. The explanation for eliminating a compatibility review in the Draft EIS is a major error. A core requirement of the refuge Administration Act is that only those uses to be found compatible may be allowed on National Wildlife Refuges. The Omnibus Public Land Management Act of 2009, Subtitle E, Section 6402 requires compliance with NEPA (42 U.S.C. 4321 et seq.) and except as provided in subsection (c), comply with any other applicable law (including regulations). Nowhere in the Omnibus Public Land Management Act does the law state, or even imply, that the Secretary of the Interior's public interest determination supersedes, or is in lieu of, the Secretary of the Interior's obligation to ensure compatibility under the Refuge Administration Act. Even if the Service concludes that the proposed land exchange is not a "use" as defined by compatibility determination regulations but is a "management activity" it should still conform to the standard that it promotes or is at least consistent with the purposes of the Izembek National Wildlife Refuge and the mission of the National Wildlife Refuge System.</p>	<p>As pointed out in the comment, the proposed land exchange is not a refuge use as defined in the Service Compatibility regulations (50 CFR 25.12). The first step in the compatibility process is for the Service to determine if it has authority over the proposed use. For the land exchange to be approved, the Secretary of the Interior, not the Service, must find it in the public interest.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 06	The Service is requested to clarify the review process for the Secretary of the Interior's Public Interest Determination:	For the land exchange to be approved the Secretary of the Interior must find it in the public interest after this EIS is completed.
	<ul style="list-style-type: none"> <li>The EIS should explain what the Secretary of the Interior's review will take into consideration and how it compares to the well-defined Compatibility Determination process. The Final EIS should clearly define how the Public Interest Determination will be conducted. The failure to define the Public Interest Determination process undermines the integrity of the current NEPA process.</li> </ul>	<ul style="list-style-type: none"> <li>For the land exchange to be approved, the Secretary of the Interior must find it in the public interest after this EIS is completed.</li> </ul>
	<ul style="list-style-type: none"> <li>The Draft EIS also says that "should the Secretary determine that the proposed land exchange and the proposed road is in the public interest, then the alignment and design of the road would be refined ... " (Draft EIS p 1-11 ). The Final EIS needs to clearly explain this process of refinement [Draft EIS Chapter 1, Page 1-11, Sec. 1.5, Paragraph 1].</li> </ul>	Should the land exchange be found in the public interest by the Secretary of the Interior, the State of Alaska and the Service and the King Cove Corporation and the Service would enter into land exchange agreements spelling out the details of the land exchanges. In the case of the State of Alaska, the exact lands to be exchanged on Sitkinak Island and how the Service and State would address lands that remain to be cleared of contaminants would be addressed. In the case of the lands for the road corridor, the Service and the State would clearly spell out the exact lands to be exchanged for the proposed road including the width of the corridor. It is anticipated that the road corridor would average 100 feet width but that some areas (for example, where larger cuts or fills are needed to meet reasonable engineering and safety standards) would be wider than 100 feet and other areas of the corridor would be less than 100 feet. See Sections 2.4.2 and 2.4.3 in Chapter 2 for additional information.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS Chapter 2, Page 2-4, Sec. 2.4.3, Paragraph 2, Alternative 3] Final project design and construction details may be different. Elaborate on this: what restrictions will there be between the information provided in the Final EIS/Record of Decision and the actual land exchange corridor and mitigation plan?</li> </ul>	See response above.
REG 07	<p>The Corps has requested that to the fullest extent possible, the Service prepare a draft environmental impact statement concurrently with and integrated with environmental impact analyses required by other environmental review laws and executive orders, (40 CFR 1502.25), which includes Section 404 of the Clean Water Act. As a result, the Final EIS should include a wetland delineation verified on-the-ground, any applicable edits of the wetland functional assessment in the Draft EIS. Without this information, the EIS will not be sufficient for the USACE to evaluate compliance with NEPA or the 404(b) requirements. Currently, the Draft EIS does not adequately evaluate the potential impacts to wetlands in sufficient detail for the Corps to determine a Least Environmentally Damaging Practicable Alternative. If the Service is not able to include this information in the EIS, then the Service should provide a written response identifying the reasons this information will not be included in the EIS document.</p>	<p>Should the land exchange be found in the public interest by the Secretary of the Interior, we acknowledge that additional National Environmental Policy Act evaluation may be required by the U.S. Army Corps of Engineers before the Corps could issue permits for construction within the waters of the United States. As expressed in the Draft and Final EIS, the level of analysis in this EIS is sufficient for the Service to make a decision regarding a land exchange and that should the land exchange be approved, the Corps and/or other federal agencies may have to supplement this EIS to meet their legal and regulatory requirements.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 08	<p>Concern was expressed that the Aleutians East Borough's transfer of the hovercraft to Akutan would be in violation of federal regulations governing the use of equipment purchased through agency grant agreements. The use of the hovercraft in Akutan must be secondary to its operation between King Cove and Cold Bay. This is stipulated in agency regulations, “[t]he grantee or sub grantee shall also make equipment available for use on other projects or programs currently or previously supported by the federal government, providing such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use shall be given to other programs or projects supported by the awarding agency (43 CFR § 12.72(c)(2)).</p>	<p>The Service has determined that if the Aleutians East Borough does not operate the hovercraft between King Cove and Cold Bay that it may be used for another project currently or previously supported by a federal agency such as the Akutan airport and that therefore the Aleutians East Borough had the authority to move the hovercraft from King Cove to Akutan.</p>
REG 09	<p>The classification of a wildlife refuge is not a good reason to deprive residents of King Cove connectivity to civilization and access to care and relief if needed.</p>	<p>The comment expresses the view that the Izembek National Wildlife Refuge should not be an obstacle to improved transportation. The Act provides direction for the review of a land exchange to provide for a road. The EIS is required to analyze the proposed road within the legal and regulatory framework established by the Congress.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 10	<p>The Service needs to evaluate the impact of Section 22(g) lands on the proposed land exchange in much greater detail. The value of the land exchange for conservation is reduced because the King Cove Corporation lands previously conveyed from the Alaska Peninsula National Wildlife Refuge were not subject to the benefits of Section 22(g), and the subsurface estate of these lands will remain under the ownership of the Aleut Regional Corporation. A U.S. District Court ruling that nullified the St. Matthew Island land exchange centered on the failure of the government to properly weigh the conservation value of Section 22(g) lands. Failure to properly assess the implications of Section 22(g) creates an exaggeration of potential benefits to conservation from exchange of King Cove lands, at the expense of accurately describing the consequences. In addition, 22(g) lands are correctly described as precluded from a compatibility determination in the Draft EIS; however, the lands that would be transferred from Izembek National Wildlife Refuge and directly impacted by the proposed road are not 22(g) lands, and the compatibility determination must consider whether the use is compatible both with the refuge’s purposes and the refuge system mission.</p>	<p>The Service partially agrees with the comment and has changed the EIS as discussed below.</p> <p>The comment is correct that the St. Matthew Island land exchange was nullified in 1984 by a U.S. District Court ruling based upon the potential benefits to conservation values from the application of the requirements of ANCSA Section 22(g). Current federal regulations <i>50 CFR Parts 25, 26 and 29, Final Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997</i> established in 2000 specifically clarified (in Part 25.21) application of compatibility determinations with respect to Section 22 (g) and the unique status of Alaska Native corporation land.</p> <p>Section 25.21 (b) provides that a compatibility determination will be made on the proposed uses of corporation lands subject to Section 22 (g) and that the determination will only evaluate the effects of the proposed uses on adjacent refuge lands and the ability of the refuge to achieve its purposes, not on the effects of the proposed use on the corporation lands.</p> <p>King Cove Corporation lands within the Izembek National Wildlife Refuge are subject to Section 22 (g) and the requirements of 50 CFR 25.21. They include the land adjacent to and within the vicinity of Kinzarof Lagoon proposed for exchange to the United States. The Service believes that Section 22(g) and the application of 50 CFR 25.21 regulations provide conservation benefits that would diminish much of the benefit attributed to acquisition of the parcels by the United States as a result of the land exchange. A compatibility determination is required for all proposed</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>uses and/or development proposals for these lands. For the King Cove Corporation parcels or lands on Kinzarof Lagoon, a compatibility determination would likely find that any major development would have significant effects on adjacent refuge lands and refuge purposes. Additionally, the 5,429.67 acre parcel within the Izembek Wilderness Area, to which King Cove Corporation has agreed to relinquish its ANCSA selection, would be subject to Section 22(g). The Service also believes that Section 22(g) and the application of 50 CFR 25.21 regulations would, if the parcel were to be conveyed to King Cove Corporation, provide conservation benefits particularly for the wetlands areas within the parcel should these lands remain in King Cove Corporation ownership. Clean Water Act protections apply regardless of ownership.</p>
REG 11	<p>The Service is requested to evaluate how efficiently and effectively the congressional solution provided [in the King Cove Health and Safety Act of 1999] was applied and managed. A public interest determination should be conducted and based on a thorough accounting of how \$37.5 million in taxpayer funds were applied to meet the needs of the people of King Cove. A review should include an examination of whether or not the hovercraft has been targeted for failure from the beginning, and the reason why the Aleutians East Borough did not create a revenue plan for the operation of the hovercraft.</p>	<p>The King Cove Health and Safety Act of 1999 is described in Section 1.1, with an account of the appropriation of \$37.5 million to provide for a marine-road link between the communities, improvements to the King Cove Airport and improvements to the King Cove Clinic. Additional information on the status of improvements under appropriations from the King Cove Health and Safety Act of 1999 has been added to Section 1.1.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 12	The Draft EIS needs to evaluate the potential for use restrictions to be removed after the road is constructed. Congress and the state have the ability to remove the proposed restrictions, as evident by the opening of the Dalton Highway and adjacent lands for public access after an initial agreement was made in that case. Once the road is built, local communities and the state may advocate for additional uses for the road, particularly commercial activities such as access for hunting guides, transport of processed fish from King Cove, and oil and gas development.	Given the lack of a reasonably foreseeable future legislative action aimed the removal of restrictions on the proposed road, it is beyond the scope of the Final EIS to speculate on such an action.
REG 13	The Final EIS should include a more detailed analysis of issues associated with designation as a Wetland of International Importance under the Ramsar Convention, including:	Additional documentation on the establishment of the Ramsar designation for Izembek Lagoon was received from the Service International Affairs office. Additional details are now provided in Section 3.2.2.2.
	<ul style="list-style-type: none"> <li>• How Alternatives 2 and 3 will affect the ecological value of an “outstanding example of a particular plant community” for which the Izembek National Wildlife Refuge was designated a Wetland of International Importance.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• Detailed information on whether the effects of the proposed land exchange were reviewed in relation to the Ramsar criteria and whether a determination was reached that the qualities of the Izembek National Wildlife Refuge would not be diminished;</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• Whether the United States has already reported to the Convention the threat to the ecological character of the listed wetlands posed by the land exchange/road corridor project, as is required;</li> </ul>	See response above.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• What the consequences are for defaulting on the Ramsar Convention and how international law may affect the project.</li> </ul>	See response above.
REG 14	The Final EIS should indicate the terms that Congress has enacted in Subtitle E of the Omnibus Act of 2009, including that Congress has:	The comment identifies several key provisions of the Act that should be included in the EIS. These provisions are summarized in several places. Section 1.1 notes that the Act authorized the Secretary of the Interior to enter into the exchange, if it is determined to be in the public interest and following preparation of an EIS. Section 1.2 identifies the purpose of the proposed land exchange, limitations on use of the road for non-commercial purposes, the parcels of land involved, and the major mitigation measures required. As these are already addressed, no change is required in this EIS.
	<ul style="list-style-type: none"> <li>• Statutorily approved of the concept of a land exchange in the Izembek Wilderness for a road connection between King Cove and the Cold Bay Airport;</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• Determined that the state parcel comprising 31,887 acres qualifies for addition to the National Wilderness Preservation System;</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• Specified that the King Cove Corporation will relinquish 5,430 acres of land that would otherwise be removed from the Izembek Wilderness;</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• Implied that changes in land use would include the loss of up to 152 acres of the Izembek Wilderness.</li> </ul>	See response above.
	<ul style="list-style-type: none"> <li>• Outlined the stipulations, mitigation measures and regulations that determine what is considered commercial driving.</li> </ul>	See response above.

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REG 15	<p>The Final EIS should examine the definition of the wetlands encompassed in the designation as a Wetland of International Importance under the Ramsar Convention. In particular, clarify whether wetlands on King Cove Corporation ownerships are indeed designated Ramsar wetlands. Provide documentation regarding coordination and consultation with the King Cove Corporation or other local residents in relation to the 1986 expansion of the Ramsar designation to the entire Izembek National Wildlife Refuge. Ramsar wetlands do not seem to be mentioned in any of the Service decisions required under ANCSA Section 22(g) nor does it seem that the Service or the Corps considered wetlands associated with the 2003 King Cove Access Project EIS to be Ramsar wetlands.</p>	<p>The Ramsar designation is based upon scientific criteria for assessing wetlands ecological values. A designation recognizes exceptional wetlands values, but does not establish any regulatory authority over land owners. The boundary of the designated Ramsar site is contiguous with the external boundary of Izembek National Wildlife Refuge as of April 1986. The total area of the designated site was originally recorded as 168,433 hectares and this area has been carried forward in all official documentation. The Ramsar boundary encompasses all State owned and privately owned lands within the Izembek National Wildlife Refuge as of the date of designation. The Secretary of the Interior's Trust Responsibility creates a wide discretion for him to act to protect Alaska Native interests, and a number of statutes and recent direction. There was no risk to tribal rights or ANCSA corporation land rights as land owners as there is no regulation of use or development of lands associated with the designation. Executive Orders concerning consultation with Tribal Governments were issued starting in 2000 with EO 13175, subsequent to the designation process. The Service was not the lead agency on the 2003 King Cove Access Project EIS. The statements that the Ramsar wetlands were not mentioned during the analysis of the 2003 EIS and about Service compatibility determinations not related to this project are not relevant to this EIS.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 16	<p>The Final EIS needs to clearly identify and articulate the right to reasonable access to subsistence resources provided by ANILCA, Section 811(a) and (b). In addition, the Record of Decision should address how best to provide legal motorized access to subsistence resources for the general public on existing motorized access routes if the exchange occurs. Both the Southern and Central Road Corridors will significantly restrict subsistence uses and restrict access to subsistence resources by traditional means. Therefore, a means of access needs to be identified for roads/trails that are currently used for traditional subsistence access. The following adjustments regarding ANILCA subsistence access provisions should be included in the Final EIS:</p>	<p>See response to each of the sub-components of this statement of concern.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS Chapter 1, Page 1-13, Sec. 1.6.1.2, Paragraph 1 Alaska National Interest Lands Conservation Act, 1st paragraph, last sentence] This sentence highlights only one, instead of the several wilderness management Sections of ANILCA. The following rewrite is suggested: In Title VII, Congress designated approximately 300,000 acres of Izembek National Wildlife Refuge as wilderness (Section 702). It is managed in accordance with the Wilderness Act of 1964 (16 USC 1131-1136), except where ANILCA expressly provided otherwise. [Delete: Additional ANILCA guidance on wilderness management (Section 1315) and other] The ANILCA provisions affecting management and use of wilderness lands are described in Titles VIII, XI, and XIII below.</li> </ul>	<p>The suggested edit has been made.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS Chapter 3, Page 3-343, Sec. 3.3.10, Paragraph 7] Under ANILCA Section 811, this use is allowed until restricted in accordance with 50 CFR 36.12(c). We suggest the following revision: Former military roads that extend into Izembek Wilderness are managed as trails. Use of off-road vehicles for subsistence access is currently allowed for local rural residents.</li> </ul>	<p>Section 3.3.10 has been rewritten to reflect that some former military roads that extend into Izembek Wilderness are currently managed as trails and that off road vehicles for subsistence access is currently allowed for local rural residents on these trails.</p>
	<ul style="list-style-type: none"> <li>[Draft EIS Chapter 3, Page 3-349, Sec. 3.3.10] Statements in this section imply that motorized access stops at the Izembek Wilderness boundary. It is requested that the section clarify that ANILCA allows motorized modes of access within the Izembek Wilderness, which may also affect opportunities for solitude.</li> </ul>	<p>Additional information has been added indicating that off road vehicles for subsistence access is currently allowed on trails within the wilderness.</p>
	<ul style="list-style-type: none"> <li>[Draft EIS Chapter 1, Page 1-13, Paragraph 2] Section 804 of ANILCA provides a priority opportunity for consumptive uses, instead of an across the board subsistence priority on public federal lands and waters. Moreover, the federal subsistence priority only applies on waters with a federal reserved water right. We request the following edit for clarification. ". . . establishes a subsistence priority harvest opportunity on federal public lands and waters with a federal reserved water right . . ."</li> </ul>	<p>No change required. This section of the EIS provides a general description of the various laws. The current language on Title VIII is legally acceptable as a summary of that part of ANILCA.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 17	<p>The Final EIS should clearly explain the process that the Secretary of the Interior will use to determine if the proposed land exchange and road are in the public interest and how the alignment and design of the road would be refined and land conveyances executed. This is important because the exchange and road would be contrary to the Secretary of the Interior’s responsibility to administer the Izembek National Wildlife Refuge “for the conservation, management, and where appropriate, restoration of the fish, wildlife, and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.” However, the Secretary of the Interior will presumably also consider his Indian trust responsibilities when determining public interest.</p>	<p>The comments seek clarification of the decision-making process following conclusion of the EIS with a Record of Decision.</p> <p>For the land exchange to occur, the Secretary of the Interior would have to find it in the public interest after this EIS is completed.</p> <p>In regard to refinement of the road design if the Secretary of the Interior determines a land exchange is in the public interest, it is common that a proposed project is reviewed on the basis of a 35 percent design, and that during the subsequent permitting stage, the engineering plans are refined. In this case, negotiation of the land exchange document would be a step in implementation in which additional engineering considerations may be taken into account. However, these design refinements may not result in environmental consequences exceeding those disclosed in the EIS, or a supplemental EIS would be required.</p>
REG 18	<p>The following revisions regarding the permitting process for road construction are requested for the Final EIS:</p>	<p>The comments propose additional details to be included in the EIS on the implementation steps for road construction following a positive determination regarding the land exchange. These suggestions have been incorporated into the identified section.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS Page 1-11 Section: Project relationship to Laws, Regulations, Policies and Required Permits p1:s3] Delete: “The State of Alaska would proceed to permit applications, reviews and decisions on the proposed road.” Replace with: The Department of Transportation and Public Facilities in cooperation with the Federal Highway Administration will begin design development of the proposed road in accordance with Title 23 Highways. This includes all applicable NEPA and other environmental approvals and permits necessary for construction of the road.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS 1.6.1 Federal, Laws, Regulations and Policies s2] If the Secretary of the Interior finds the land transfer in the public interest, the state through the Department of Transportation and Public Facilities would construct the road with Federal-Aid Highway Funds. These would be funds through the “Community Transportation Program” and have been included in the 2012-2015 Alaska Statewide Transportation Improvement Program (Need ID 26120) Suggested sentence: Next the framework laws for the U.S. Army Corps of Engineers (a cooperating agency) and the Federal Highway Administration (a cooperating agency) are described.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS 1-24 Major Federal Permits and Authorizations] Add bullet: The Federal Highway Administration will need to issue an independent Record of Decision before federal-aid funds could be expended for construction of a road per 23 U.S.C. Highways.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
REG 19	<p>The State of Alaska feels that deferring the Service’s mitigation responsibilities, under Executive Order 11990, to the Corps and Alaska Department of Fish and Game is inappropriate and inconsistent with the Service’s responsibility. The Final EIS should include an appropriate mitigation analysis in accordance the EO 11990 that takes into account avoidance, minimization and compensatory mitigation. The mitigation analysis should be specific to each of the road alternatives or compensatory measures that could reduce or eliminate the impact. In addition, the means to mitigate the adverse impacts to wetlands have not been addressed in accordance with the mitigation hierarchy describe in 40 CFR 1508. It is recommend that the discussion on EO 11990 be rewritten to document mitigation in accordance with NEPA requirements. [Draft EIS p. 4-125, 4.3.2.2 Mitigation Measures, last sentence].</p>	<p>Appendix F has been updated. The EIS examines likely mitigation measures associated with all action alternatives. If the Secretary of the Interior determines the proposed land exchange is in the public interest, a more detailed enforceable mitigation plan would be developed concurrent with negotiations of the land exchange agreement and permit conditions to address the alternative selected.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 20	<p>Further clarification is requested on the status of Federal Aviation Administration lands in the event that the land exchange is authorized. Specifically, more detail is needed on whether the Service will relinquish its “secondary management authority” referenced on page 3-202 [Draft EIS p. 4-174 4.3.3.1 Federal Aviation Administration Lands].</p>	<p>Passage of ANILCA resulted in the creation of new national wildlife refuges in Alaska. Numerous areas that were withdrawn prior to ANILCA for the use of other federal agencies were included within the boundaries of these new refuges. Section 305 of ANILCA designated these lands as refuge lands but also provided guidance regarding the respective jurisdiction of the federal agencies having administration and management responsibilities for them. The withdrawn lands are to be managed in accordance with applicable laws and regulations that apply to national wildlife refuges, but are subject to the primary jurisdiction of the agency holding the withdrawal, to use and administer the withdrawn lands for the purposes specified in the order creating the withdrawal.</p> <p>Because the land within ANS 176, withdrawn for and administered by the FAA, is refuge land the Service is prohibited under the terms of the National Wildlife Administration Act from relinquishing an interest in refuge land, including “secondary management authority”, other than through a land exchange. In the event a land exchange is determined to be in the public interest by the Secretary of the Interior, the Service with FAA concurrence may either grant a right of way for the section of the proposed road within ANS 176 or include the road corridor through ANS 176 as a part of the land exchange.</p>

<b>SOC Code</b>	<b>Statement of Concern (SOC)</b>	<b>Response</b>
REG 21	It is recommended that Service complete the required review for eligible historic properties under Section 106 of the National Historic Preservation Act and include the information from its determination in the Final EIS. Otherwise the Section 106 determination may preclude the selection of all or part of certain alternatives and also force additional analysis under NEPA in the future.	During the 2012 summer field season, the Service completed the review of eligible historic properties required under Section 106 of the National Historic Preservation Act. The information from the Service's determination has been incorporated into the Final EIS as Appendix H. The analysis of impacts from Alternatives 2 and 3 have been revised to refer to results from the 2012 cultural resources survey (Section 4.3.3.8 and 4.3.4.8).

SOC Code	Statement of Concern (SOC)	Response
REG 22	<p>Concern was raised that there may be a statutory conflict between the Omnibus Public Lands Management Act and NEPA. This conflict arises in how the Omnibus Public Lands Management Act designated the cooperating entities required to participate in the NEPA process, several of whom have an interest in having the road built.</p>	<p>The Service recognizes that several of the cooperating agencies are also proponents for selection of an alternative that would consummate the proposed land exchange and lead to construction of a road. The Service has regularly reminded those cooperating agencies of their dual role during meetings and has consistently exercised its authority as the lead agency in making decisions regarding to content of the EIS so that the content of the draft and final EIS reflects the requirements of both NEPA and the Omnibus Public Lands Management Act. Council on Environmental Quality and Department of the Interior Regulations regarding cooperating agencies allow entities that are project proponents to participate as cooperating agencies in the NEPA process. The NEPA regulations state, "Use the environmental analysis and proposals of cooperating agencies with jurisdiction by law or special expertise, to the maximum extent possible consistent with its responsibility as lead agency." The Service has carefully weighed information provided by cooperating agencies that was used in this EIS to insure that it was factual and not supporting an advocacy role. Each cooperating agency is participating in this EIS process under the terms prescribed in a Memorandum of Understanding between the agency and the Service. Roles are clearly defined, including the role of the Service as lead agency and that the Service makes all final decision regarding the preparation of and content of the EIS documents.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 23	Residents have asked for clarification on how individual comments and statements are factored into the Service Regional Director’s decision. In addition, more detail is requested on how the Regional Director’s evaluation/recommendation will affect the Public Interest Determination by the Secretary of the Interior and whether the Secretary of the Interior will be able to hear the statements of local people affected by the road.	The Final EIS includes a new Section 1.10 that describes the process for public meetings and receiving comments on the Draft EIS and the way in which the Service addressed all substantive comments and incorporated changes into the Final EIS as appropriate. In addition, Section 1.5 provides an overview of the decision making process following the Final EIS, as required under NEPA and the Act. This includes a Record of Decision on the Final EIS by the Service Regional Director which will identify the Service's decision on the preferred alternative, what alternatives were considered, and whether all practicable mitigation measures were adopted. For a land exchange to be approved, the Secretary of the Interior must determine that the proposed land exchange is in the public interest, as required in the Act. The Secretary of the Interior would consider the EIS and other factors, including compelling local and national-level public interests. This would certainly include the public comments and testimony by local residents during public meetings on the Draft EIS.
REG 24	It is requested that the Final EIS and the Secretary of the Interior consider the United States of America’s trust responsibility to Alaskan Natives when considering the proposed land exchange.	This request would likely be considered as part of a public interest determination.

SOC Code	Statement of Concern (SOC)	Response
REG 25	A resident has requested that the Alaska Native Claims Settlement Act be used to resolve the issue of a road to Cold Bay. The road is a longstanding issue between the aboriginal people and the US government and the type of problem ANCSA was designed to resolve.	The Alaska Native Claims Settlement Act (ANCSA) resolved all outstanding claims based in aboriginal title to lands in Alaska when it was signed in December 1971. ANCSA did not include provisions to submit new claims, based on aboriginal title. It was intended to resolve the long-standing issues surrounding aboriginal land claims in Alaska that existed prior to the signing of ANCSA into law in 1971. The role of ANCSA in relation to the proposed action is accurately reflected in Section 1.6.1.8.
REG 26	The EIS should clarify whether the project can fully comply with the Migratory Bird Treaty Act (Appendix F, Page F-5, “Migratory birds, their eggs, and young are fully protected by International treaty”) and disturbance and direct mortality to migratory birds (Appendix F, Page F-8, “...the project proponent would be required to coordinate ... breeding bird surveys to minimize the disturbance or injury to breeding birds”).	Section 4.3.2.4 and Appendix F outline mitigation measures that would reduce disturbance and direct mortality of migratory birds, impacts covered under the Migratory Bird Treaty Act. Detailed mitigation measures would be developed and described in an enforceable mitigation plan that would only be developed if the Secretary of the Interior determines the land exchange is in the public interest. While Appendix F has been expanded, final descriptions of the mitigation measures and responsibilities for enforcement would be provided in the enforceable mitigation plan to ensure that the project will fully comply with the Migratory Bird Treaty Act and to conduct breeding bird surveys consistent with Service protocols.

SOC Code	Statement of Concern (SOC)	Response
REG 27	<p>EPA reviewed the EIS in accordance with its responsibilities under Section 309 of the Clean Air and the National Environmental Policy Act, assigning an overall rating of EC-2 (Environmental Concerns-Insufficient Information). The EIS should be revised to provide more complete information on potential impacts to wilderness characteristics, a site on the Ramsar List of Wetlands of International Importance, hydrology, habitat, wetlands, the No Action Alternative, and historic properties.</p>	<p>The comments from the EPA generally requested additional analysis in the same subject areas. Numerous revisions have been made to Chapter 4 to provide more complete information regarding the effects of the road alternatives on the Ramsar List of Wetlands of International Importance as described in PUB 03; for hydrology in response to PHY HYD 03; for habitat in response to BIO WILD 01, 02, 04, 09, 10, 11, 22, 31, 37, 42, and 43; for wetlands in response to BIO WET 03, 04, 06 and 07. All available information has been considered.</p> <p>NHPA review is being conducted as a parallel process to the EIS. The Final EIS includes Appendix H detailing the process and results of the National Historic Preservation Act review. Archaeological and historical survey was conducted in August 2012. The sites discovered have been assessed for National Register eligibility. The Area of Potential Effect and results of consultations with the State Historic Preservation Office, tribes, local governments, and other interested public is included in Appendix H.</p>

SOC Code	Statement of Concern (SOC)	Response
REG 28	<p>An EIS’s purpose and need statements are critical in that they form the foundation for the remainder of the document. I found Chapter 1 of this DEIS very confusing and possibly misleading to both the public and ultimate decision makers. The problem, in part, may be due to the need for this EIS to support 3 individual and apparently sequential decisions:</p>	<p>The comment suggests an approach to clarifying decision-making that would be required to approve a land exchange 1) the EIS and Record of Decision, 2) the Secretary of the Interior determining that the land exchange is in the public interest, and 3) the Corps 404 permitting process. These are useful suggestions and the language in Section 1.8 has been revised to clarify these steps.</p> <p>The comment also urges that the decision process and criteria for the Secretary of the Interior's public interest determination be better defined in the Final EIS. The Secretary of the Interior would make a public interest determination after this EIS is completed and after the Service’s Alaska Regional Director has issued his Record of Decision for this EIS.</p>
	<ul style="list-style-type: none"> <li>• 1) The Omnibus Public Lands Act directs the Secretary of the Interior to develop and EIS to analyze the proposed land exchange; the potential construction and operation of a road between the communities of King Cove and Cold Bay, Alaska; and an evaluation of a specific road corridor through the Refuge that is identified in consultation with the State, the City of King Cove, Alaska, and the Tribe. This task has been delegated to the Service, as noted in the DEIS: “The Service is the lead agency responsible for preparing the draft and final EIS documents. After completion of the Final EIS, the Service will issue a Record of Decision with a recommendation to the Secretary of the Interior regarding the proposed exchange of lands.” The DEIS also notes the primary criteria that the Service will use in making its recommendation, presumably via a ROD: “The EIS must consider the Service’s mission and other mandates, including refuge purposes to provide opportunities for subsistence uses by local residents.”</li> </ul>	<p>See above response.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• 2) Upon completion of the EIS, the Act requires the Secretary of the Interior to determine whether the exchange is in the “public interest.” The Act provides no guidance as to what the Secretary of the Interior should consider other than saying that his decision is “subject to” the required EIS. The DEIS suggests something different, however, when it states: “Final Department of the Interior action rests with the Secretary of the Interior, who considers the EIS and other factors to issue a public interest determination. The Secretary of the Interior must balance the various and compelling local and national level public interests.”</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• 3) According to the DEIS, if, and only if, the Secretary of the Interior finds the exchange to be in the public interest, the Corps would then issue a second ROD on the EIS, authorizing “the least environmentally damaging practicable alternative” as part of its permitting responsibility and process. Though not explicitly stated, it appears that Alternative 4 and 5 were included for this analysis. The possibility of the Corps denying road construction subsequent to a positive public interest finding by the Secretary of the Interior appears to be acknowledged in the Act: “(c) FEDERAL PERMITS.—It is the intent of Congress that any Federal permit required for construction of the road be issued or denied not later than 1 year after the date of application for the permit. “</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• These three individual and sequential decisions need to be more clearly defined and decision criteria articulated in order to allow meaningful public comment. For example, while five alternatives have been developed in the Draft EIS, the Service can realistically only recommend one of three alternatives to the Secretary of the Interior: Either the “No Action”, or one of the two exchange/road alternatives (Alternatives 2 and 3). The Draft EIS needs to better explain why the Service’s Record of Decision will only be viewed as a recommendation to the Secretary of the Interior.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Lastly, it is essential that the Draft EIS better articulate what “various and compelling local and national level public interests” the Secretary of the Interior must balance in making his public interest determination. The decision process and criteria are so vague in the Draft EIS as to preclude meaningful public input. The EIS needs to be amended to clarify this critical issue, with time for public comment.</li> </ul>	See above response.

## Socioeconomic Resources (SER)

SOC Code	Statement of Concern (SOC)	Response
SER	General comments on socioeconomic resources and analysis.	Category Code; no response required.
SER SER 01	The Draft EIS understates socioeconomic impacts related to Alternatives 2 and 3, and should be revised. Having reliable access between communities would be a major impact. The EIS should be revised to reflect this and include supporting evidence such as:	New language has been added to Sections 3.3.2 (Socioeconomics) and 3.3.4 (Public Health and Safety) to capture information about these issues, such as these the commenter notes. No quantitative research was undertaken about quality of life issues as part of this EIS, or by others. Much qualitative information was gathered in the public meetings during scoping process and Draft EIS public comment period. Some of this information has been incorporated in the above sections to describe the affected environment.
	<ul style="list-style-type: none"> <li>Some boat owners from outside are reluctant to winter boats in the King Cove Harbor because no reliable access in or out of King Cove exists.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>King Cove School sports teams have to play a majority of their games “away” because other school’s athletic directors do not want their teams to get stuck in King Cove due to weather and environmental factors.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>King Cove students also miss out on educational trips, such as the junior class trip to Washington, DC. If the flights out are cancelled due to weather, and the student misses the trip, they would not be able to get reimbursed for the money that the class raised.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Young people would not move away and go live in other communities where travel time does not mean the difference between life and death.</li> </ul>	See above response.
SER SER 02	There is a discrepancy between the Executive Summary and the Draft EIS text when discussing the effects of the road alternatives on socioeconomics, specifically related to education. The Draft EIS says that education would be viewed as an indirect effect of reliable transportation (students staying in school longer, higher graduation rates, etc.). The Executive Summary says these effects are negligible. Education in rural Alaskan communities is extremely important, and warrants a higher impact rating than negligible. Any discrepancies between the Executive Summary and the Draft EIS in this regard should be rectified.	The summary of socioeconomic effects in the Executive Summary is an over-view of effects and estimates changes to population, demographics, and employment. The EIS socioeconomic section describes each measure in much more detail and provides the background for the impact rating. The Socioeconomic section has been revised to include comments such as this one that were contributed in public meetings about education and other items.
SER SER 03	The Draft EIS should be revised to reflect that the road alternatives would ultimately lead to increased development (more people and structures) that is not needed.	Section 4.3.3.3 (and by reference Section 4.4.3.3) describes under "cumulative effects" that additional traffic could result in further road improvements and new construction within the communities of King Cove and Cold Bay. Section 4.3.3.2 (and by reference Section 4.4.3.2) discusses a potential 5 percent increase in population as a result of the addition of 6-12 jobs. The community desirability or "need" of induced development is not evaluated in the EIS, but it is recorded in the scoping report, Appendix C.

SOC Code	Statement of Concern (SOC)	Response
SER SER 04	The Draft EIS should be revised to reflect that the road alternatives will not bring in jobs or improve safety between the communities.	The road alternatives would create some jobs, both for construction and operations, and as a result of induced development, as discussed in Section 4.3.3 and 4.4.3. Relative safety of the modes described in Alternatives 1-5 is dependent on operating conditions, maintenance, and law enforcement. This is discussed in Chapter 4 for each alternative.
SER SER 05	The Draft EIS should be revised to identify the significance of the following items as they relate to the need for safe, reliable and dependable transportation access to the Cold Bay Airport, particularly in times of health and medical emergencies:	The resident/non-resident status, housing, gender, age, education, and the fiscal characteristics of local government have been well-described in the EIS.  Additional information has been provided by commenters during the scoping and public review process.  Sections 3.3.2 and 3.3.4 have been revised to qualitatively describe transportation in regard to the socioeconomic profile.
	<ul style="list-style-type: none"> <li>• The difference between King Cove residents (permanent or temporary workers) living in group quarters versus standard housing [Draft EIS p. 3-215, first paragraph];</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The gender and age characteristics of the populations of King Cove and Cold Bay [Draft EIS p. 3-223, 3-224];</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Levels of educational attainment between the residents of King Cove and Cold Bay [Draft EIS p. 3-229, last paragraph];</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The fiscal status of the communities of King Cove and Cold Bay, as well as the fiscal status of the Aleutians East Borough as a whole [Draft EIS p. 3.254, Section 3.3.2.4, first paragraph].</li> </ul>	See above response.
SER SER 06	The Draft EIS should be revised to reflect accurate information about the City of King Cove sales tax, including:	The text has been corrected for the first and second points. The Boyette 2011 reference is correct in the text and has not been changed.
	<ul style="list-style-type: none"> <li>There is a discrepancy between what is presented on Draft EIS p. 3-255 and the last paragraph on Draft EIS p. 3-256. The City has a 4 percent general sales tax and a 2 percent raw fish tax, which together in 2009 generated almost \$1.8 million in revenue, and Table 3.3.35 should be corrected to reflect this information.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The sentence and reference to (Boyette 2011) sharing sales tax information is likely wrong and should be corrected.</li> </ul>	See above response.
SER SER 07	The Draft EIS should be revised to reflect accurate information about the cost of living in King Cove and Cold Bay [Draft EIS, p. 3-259], including:	The cost of living section in Chapter 3 is accurate; it reflects the best available published data from the Power Cost Equalization Program, and from other sources as cited. Community data collection of cost-of-living data was not within the scope of the EIS. In accordance with the reviewer's comment, Section 3.3 has been revised to include the fuel/power information provided
	<ul style="list-style-type: none"> <li>The City of King Cove hydro-power facility operates year round;</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• The City of King Cove has bigger, newer, and more energy-efficient diesel-powered generators;</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The City of King Cove does not supply any power to an industrial user (Peter Pan Seafoods);</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The public utility in King Cove is city-owned, not borough-owned;</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Fuel cost comparison discussion is inaccurate. The reason for the difference in fuel costs is because King Cove has a public, not-for-profit fuel operation, while Cold Bay has a private, for-profit operation.</li> </ul>	See above response.
SER SER 08	There is a discussion in the Draft EIS about the male dominated populations in the City of King Cove and the Borough. The Draft EIS should be revised to include a similar discussion for race that shows Cold Bay to be overwhelmingly white and not Native, as in the rest of the Borough [Draft EIS p. 3-223].	The discussion on ethnicity included in the report is sufficient and discusses the issue to the extent necessary. The report states that “The racial composition of City of Cold Bay is predominantly White; although the share of Whites has declined from 93 percent in 1990 to 72 percent in 2000 (Table 3.3-24 and Figure 3.3-13).” Table 3.3-1 was revised to include ethnicity at the Borough level.

SOC Code	Statement of Concern (SOC)	Response
SER SER 09	The Draft EIS should be revised to include an explanation as to how Cold Bay is shown to have a higher poverty rate, with a much higher median family income of \$147,917, than King Cove.	<p>It is important to note when the comparison between the two communities is for families or individuals. Comparing 2009 American Community Survey estimates, the median family income for the City of Cold Bay was \$147,917 while the City of King Cove was \$54,167. However, the City of King Cove has a higher individual poverty rate than Cold Bay.</p> <p>The EIS has been revised for clarity about the source of the statistics, and individuals or groups to which they apply.</p>

## Socioeconomic Resources – Archeological/Cultural Resources (SER ARC)

SOC Code	Statement of Concern (SOC)	Response
SER ARC	Comments related to impacts to historic properties and cultural resources (impacts to physical objects).	Category Code; no response required.
SER ARC 01	<p>There is insufficient data to conclude that the road construction would have a moderate to major impact on cultural resources [Draft EIS p. 4-205, Section 4.3.3.8 Summary and Conclusion]. The Draft EIS incorrectly states that uncontrolled excavation, looting, or other damage to archaeological, historic, and cultural properties will take place if Alternative 2 or 3 is chosen. With the application of standard mitigation measures (bollard/chain barrier), the impacts should be revised in the Final EIS to negligible to minor. There have been no reports of uncontrolled excavation, looting, or other damage to archaeological, historic, or cultural properties off of the road to the northeast corner of Cold Bay [Northeast Terminal]. An on-site evaluation of the road corridors by a qualified archaeologist is necessary to identify potentially affected resources/properties.</p>	<p>The Service archaeologist led a field survey in August 2012 to identify cultural resources with the road corridor lands proposed for exchange and adjacent lands up to a mile beyond the actual corridors, as an area of potential indirect effects. The results are summarized in Section 3.3.8.4, and detailed in Appendix H.</p> <p>The comment misstates the language of the section regarding indirect effects, because it says that the activities “could” have an effect, not that they “will” have such an effect.</p> <p>The impact ratings proceed from paragraphs that describe direct and indirect potential effects, to discussion of mitigation measures, and a conclusion that takes mitigation measures into effect. Impact ratings have been revised for consistency, discussion of indirect effects has been more fully developed, and the conclusions on summary impact have been reduced to minor. The Final EIS notes that when cultural resource protection measures are taken into account, there would be no direct effects from construction and operation under Alternative 2 and Alternative 3. In contrast, indirect effects, beyond the project area could include unauthorized excavation</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>and looting, and might affect currently unknown subsurface cultural resources, for which there is no estimate of the scientific importance. This led to a wide range of possible levels of impact. The discussion of mitigation measure notes that regular monitoring and interpretation could reduce the impacts to none or only minor impacts. Discussion of cumulative effects does not reveal additional reasonably foreseeable future actions which would interact with the project in impacting cultural resources. The summary conclusions for Alternative 2 and Alternative 3 estimate minor impacts to cultural resources.</p>
SER ARC 02	<p>The EIS should not use the centerline of the road alignments to determine the actual boundary of the lands to be transferred to the state under Alternatives 2 and 3. This approach does not provide flexibility to avoid undiscovered archaeological, cultural, or historic resources that may be located within the footprint of the road corridor.</p>	<p>Until the exchange is made, there is some flexibility to adjust the road alignments to avoid archaeological, cultural and historic resources. The Service archeologist led a cultural resources survey in August 2012, examining the proposed road corridors, and also the area of potential indirect effects one mile beyond the corridor. In addition there is always a possibility additional historic properties could be found during construction.</p>

SOC Code	Statement of Concern (SOC)	Response
SER ARC 03	The following documentation and edits related to archaeological, historic, and cultural resources should be made in the Final EIS:	NHPA review is being conducted as a parallel process to the EIS. The Service archeologist led a field survey effort in August 2012 to identify cultural resources with the lands proposed for exchange, as well as adjacent lauds up to a mile beyond the actual exchange parcel, as an area of potential indirect effects. The results are summarized in Section 3.3.8.4, and detailed in Appendix H, which includes an evaluation of sites for National Register eligibility. The Area of Potential Effect and the status of consultations with the State Historic Preservation Office, tribes, local governments, and other interested public are documented in Appendix H.
	<ul style="list-style-type: none"> <li>• Conducting an on-site inventory prior to any groundbreaking activity as proposed in the Draft EIS is inadequate [Draft EIS p.2-81]. It does not give the Secretary of the Interior adequate information to make an informed decision, and also does not meet the Service's National Historic Preservation Act obligations.</li> </ul>	
	<ul style="list-style-type: none"> <li>• An archaeologist and/or historian should walk both road corridors to identify the presence of National Register of Historic Places properties [Draft EIS p. 4-205, Section 4.3.3.8].</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Cultural resources identified in the vicinity need to be assessed for The National Register of Historic Places eligibility, and evaluated in accordance with Section 106 of the National Historic Preservation Act. The Final EIS should document compliance with Section 106 of the National Historic Preservation Act [Draft EIS p. 4-205, Section 4.3.3.8].</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The area of potential effect should be identified on a figure and the Service's rationale for the area of potential effect should be documented.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The results of consultation with the State Historic Preservation Officer, affected Tribes, and other consulting parties, and the results of any field investigations should be documented.</li> </ul>	See above response.
SER ARC 04	<p>There is inadequate site information related to the discussion of direct and indirect construction impacts to archaeological and cultural resources [Draft EIS p. 4-205, Section 4.3.3.8]. The Draft EIS does not identify sites that would be impacted by construction nor discuss if there are options that would avoid the sites. A qualified archaeologist has not evaluated either road alternative alignment to identify sites that would be impacted. This discussion needs to be revised in the Final EIS.</p>	<p>National Historic Preservation Act, Section 106, review is being conducted as a parallel process to the EIS. The Service archaeologist led a field survey in August 2012, but a team of archaeologists and historians meeting the Secretary of the Interior's Qualifications will assess and identify historic properties. The Final EIS includes Appendix H detailing the process and results of the National Historic Preservation Act review. Maps in the appendix detail the Area of Potential Effects and indicate the survey coverage. Consultation with communities has proceeded under the broader EIS process, and is ongoing. The status of consultations with the State Historic Preservation Office, tribes, local governments, and other interested public is included in the appendix. The sites discovered will be assessed for National Register eligibility. This information is included so as to make it possible for the Secretary of the Interior to completely evaluate the several alternatives impacts on cultural resources.</p>

## Socioeconomic Resources - Cultural Values (SER CUL)

SOC Code	Statement of Concern (SOC)	Response
SER CUL	Comments on how the road may bring cultural changes or that traditional knowledge should be used as part of the analysis.	Category Code; no response required.
SER CUL 01	The Aleut people have been stewards and taken care of these lands long before any government or special interest group came along and will continue to long after they are gone. The precedent that has been set by the Aleut people and the people of King Cove and Bristol Bay is respect for the land, the wildlife, and the people. There used to be 15,000 people that lived in the head of Morzhovoi Bay, and the land was not damaged or contaminated. The Aleut people take only what they need from the land. The government should not be allowed to tell the Aleut people that they cannot cross their traditional lands, and the presence of a road will not increase potential negative impacts to the physical, biological, or social environments.	The comment expresses concern with the government's authority in relation to Aleut traditional lands. This is a concern beyond the scope of this EIS. However, preparation of an EIS ensures all effects, beneficial and adverse, of a project are fully considered before a course of action is decided.
SER CUL 02	The Service should work closer with the local communities when determining possible impacts to the biological environment and incorporate more Traditional Knowledge into the rationale for impact conclusions. Discussions about impacts resulting from construction and operation of a road would have more credibility if the Service uses information from the people that have lived in the region and use the land daily.	The Service agrees with the comment. The EIS process is an attempt to capture this kind of information from affected communities. Input on these issues has been solicited from the communities, tribes, local governments and interested individuals through government to government consultations, public meetings, and other public involvement efforts. Specifically, the Service has met with members of the Agdaagux and Belkofski tribes to develop an understanding of the use in the area and to discuss Traditional Knowledge of the area. In addition, we have met with tribal members individually to receive additional information. These data are incorporated in the document.

SOC Code	Statement of Concern (SOC)	Response
SER CUL 03	Tribal elders should be considered as a cultural resource. Elders have to relocate from local communities in order to have better access to health care. This loss of cultural resources within the communities should be considered in the EIS.	The Service agrees with this comment. Section 3.3.2 has been updated with similar comments contributed at public meetings, to more fully demonstrate this concern in the EIS. There is no quantitative data available to determine the number of elders who relocate for medical reasons, but it is acknowledged that even one represents a cultural effect. Each alternative has different considerations in providing access to medical care outside the region, as described throughout Chapter 4.
SER CUL 04	The summary of direct and indirect effects to cultural resources resulting from Alternatives 2 or 3 should be revised in the Final EIS. The federal and state processes of review and documentation, coupled with the implementation of mitigation measures, should enable the impact rating to be revised to negligible to minor (in relation to disturbance to resources). Impacts to the culture of King Cove residents resulting from a road should be major –beneficial [Draft EIS p. 2-73].	The cultural resource impacts in the summary table are impacts to sites, objects, and areas of historical significance. As noted in response to SER ARC 01, the conclusions on summary impacts to cultural resources from Alternatives 2 and 3 have been revised.
SER CUL 05	The impact of the No Action alternative on cultural resources should be revised in the Final EIS. Trust responsibility should be considered a cultural resource by the Service, and implementation of the No Action alternative would have a major – adverse impact, through permanent effects that can be measured by loss of life and/or the deleterious effect on medical health of tribal members [Draft EIS p. 4-88].	The Secretary of the Interior’s Trust Responsibility is recognized as a very important commitment to Alaska Native people. Cultural resources are analyzed on the basis of definition in the National Historic Preservation Act (see Section 1.6.1.13). For expanded discussion of the basis for evaluating the effect of the No Action alternative, see Section 4.1.

## Socioeconomic Resources - Environmental Justice (SER EJ)

SOC Code	Statement of Concern (SOC)	Response
SER EJ	Comments related to the environmental justice analysis or data used for the analysis.	Category Code; no response required.
SER EJ 01	The conclusion under the environmental justice heading in the Draft EIS that a “no road” decision will have “no adverse effects” on the low-income and minority populations of King Cove is incorrect and should be revised by the Service. Rationale for revising the conclusion includes:	There would not be a disproportionate adverse effect under the No Action Alternative because there would not be an action that changes existing conditions and creates a new effect to minority or low income populations.
	<ul style="list-style-type: none"> <li>• King Cove residents’ health has a high probability of greatly suffering if Secretary Salazar finds that the road is not in the public interest.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• There is an adverse economic affect to King Cove’s low-income and minority residents if the road is not completed due to the high cost of flights to and from Cold Bay, or because residents cannot risk that bad weather will prevent their timely return to jobs and families.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER EJ 02	<p>The needs of western Alaska residents should be taken into consideration and should not be marginalized. The desires of the Native community in and around Izembek National Wildlife Refuge should be addressed in the EIS.</p>	<p>The Agdaagux Tribe of King Cove and the Native Village of Belkofski are cooperators in the development of the EIS, as are the City of King Cove, Aleutians East Borough, and the King Cove Corporation, all of which represent the needs of western Alaska residents. Section 1.0, Purpose and Need, section of Chapter 1, incorporates the needs and desires of the Native community in and around Izembek National Wildlife Refuge. The needs of affected western Alaska residents are addressed in the alternatives (Chapter 2), affected environment (Chapter 3), and environmental consequences (Chapter 4) sections of the document.</p> <p>Additional information about the final determination of impact levels, overall public process, and consultation with cooperating agencies can be found in Chapter 1 and summarized under comments G2G 01 and COOP 01.</p>
SER EJ 03	<p>The land use decisions around Izembek National Wildlife Refuge were made without any thought of the indigenous people living next to those lands. The EIS process, where the Aleut people have to “beg” for a road that ensures their health and well-being is a form of prejudice.</p>	<p>The Service has incorporated the commenter’s often-noted concern, and it has been documented throughout the scoping and public review process. Every attempt has been made within the EIS process to ensure opportunities to comment, and to provide an unbiased analysis of the alternatives.</p> <p>A brief history of the creation of the Izembek National Wildlife Range (1960) and its re-designation as the refuge within the context of ANCSA (1971) and ANILCA (1980) can be found in Section 1.6. We have received numerous comments in support of the purpose of the proposed action: to address health and safety issues, including reliable access to and from the Cold Bay Airport.</p>

## Socioeconomic Resources - Health and Safety (SER H&S)

SOC Code	Statement of Concern (SOC)	Response
SER H&S	Comments related to safe travel, including perspectives that the current (no action) options are hindering medical care, while the proposed road (action) could cause even more driving-related injury and human health impacts. Also includes comments related to other aspects of public health.	Category Code; no response required.
SER H&S 01	The Draft EIS does not adequately describe the danger and fear in traveling by air or boat during extreme weather.	The EIS addresses the potential hazards associated with traveling from King Cove to Cold Bay in Section 3.3.4, and by Alternative in Chapter 4. These issues are also addressed in Sections 3.3.3 and 3.3.4. The last paragraph in Direct Effects and Indirect Effects in Section 4.2.3.4 describes the overall concerns of residents in King Cove about current lack of safe and reliable transportation to medical services, which some indicate affects their peace of mind and results in a lack of control and independence in their lives. In addition, a new section has been added to Section 3.3.4, which describes reports given at public meeting of individuals' real life experiences, fears, and concerns related to the potential hazards associated with traveling from King Cove to Cold Bay.
	<ul style="list-style-type: none"> <li>• Extreme weather prevents air travel.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The Cold Bay and King Cove airports are perceived as dangerous and/or tricky to fly into.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• One resident described there is nearly a mishap every time any plane has to land or take off [at the King Cove Airport]. Everyone that I know dreads the idea of flying in or out. Most residents would rather take a boat than fly in or out. Most pilots are reluctant to fly in or out of there unless conditions are at their best.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Residents and visitors have a fear of flying. There needs to be a good description of this so that those who have not experienced travel between these two communities can really get a feel for the extreme need here.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Children have a fear of leaving the village; fear of flying to Anchorage.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• One resident described their preference for the ferry rather than flying because they are so scared of it.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• One airline representative would be glad to get rid of its Cold Bay to King Cove connection and let people drive instead. He believes it would be better for the community.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER H&S 02	<p>The analysis of alternatives needs to reflect that hovercraft and other marine alternatives are not practical for passengers with medical conditions because sea travel can be very rough and the travel time can be over two hours. It is dangerous for the crew and healthy passengers (family members) too. The Cold Bay harbor is difficult to get into (it can be iced-in); difficult to tie-to; the dock ladder is difficult and dangerous to climb (it can even be icy); some people must get hoisted by crane or lifted by rope. For those with medical emergencies, such a climb may not even be possible.</p>	<p>Section 4.2.3.4 provides information on the potential dangers and dependability of each form of marine transportation depending on weather conditions and other factors. These issues are also addressed in Sections 3.3.3 and 3.3.4. Table 4.2.3–10 lists the estimated travel times, by modes of transit, for Alternatives 1-5. Table 4.2.3–11 lists the summary of consumer costs, reliability, and travel time estimates for Alternatives 1-5. A new section has been added to Section 3.3.4 which describes reports contributed at public meetings of individuals’ real life experiences, including concerns related to the potential hazards associated with traveling from King Cove to Cold Bay by the marine alternatives.</p>
SER H&S 03	<p>The Draft EIS understates the risk of the road greatly because it uses statistics from roads that are not as hazardous as the one designed between King Cove and Cold Bay. At times, a road would be better than other alternatives for getting emergency evacuees from King Cove to the Cold Bay Airport, but the Draft EIS correctly acknowledges that roads are also a source of human injury and death. Should the road be built, it is highly likely that more people will be injured or killed driving the road in the next 20 years, than have been injured or killed when traveling by boat or plane between King Cove and Cold Bay in the last 20 years. A road would not significantly improve the health and safety of King Cove residents.</p>	<p>Information has been added to Section 3.3.4, which describes reports contributed at public meetings of individual experiences, including concerns related to the potential hazards associated with traveling from King Cove to Cold Bay by the modes discussed in the alternatives.</p> <p>The Act stipulates that the road would be a single-lane gravel road. The capacity of this design necessitates speed limit restrictions, as referenced in Chapter 2.</p> <p>The following information has also been added into Table 2.8-1 in Chapter 2 and in Section 3.3.4.</p> <p>Safety: It is common for a small percentage of drivers to exceed the safe operating speed on most roads; it is anticipated most drivers will operate at a safe speed.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Should the King Cove to Cold Bay road be built, it is highly unlikely that the estimated 1.1 million miles each year driven on it will be at or even near the road design speed of 20 miles per hour.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>No one will spend 2.25 hours driving between King Cove and Cold Bay at 20 miles per hour. It is not realistic that drivers will stick to the design speed of 20 miles per hour.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Add high-speed driving too poor weather, gravel surface, single lane, steep ditches and drop-offs, numerous 10 percent grades, and no guardrails, and you have a recipe for mishaps.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>If people try to make it to Cold Bay in bad weather and break down, they would threaten the lives of would-be rescuers.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>In general, more people die in cars than in aircraft.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>To maintain the road for travel in such conditions would clearly jeopardize life.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Hurricane winds combined with darkness, avalanche conditions, and ice-glazed roads, an attempt to travel the proposed road would be foolish beyond any reason, regardless the emergency or business.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Dangers including zero visibility combined with hundred-plus mile per hour maelstroms with black ice, impossible traction and steering, devoid of any shelter, and impenetrable drifts, possibly combined with avalanches.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Under the poor weather scenarios, the road is a hazard in and of itself.</li> </ul>	See above response.
SER H&S 04	The EIS does not adequately describe the existing lack of access to medical facilities and the hardships encountered with existing modes of travel. Our families and fellow resident's welfare, health, and safety are of utmost importance to this community. Residents have the right to access the health care providers in Anchorage, regardless of the weather. We believe the construction of a road (Alternatives 2 and 3) would save lives and improve welfare, health and safety of King Cove residents.	Section 4.2.3.4 provides information on the potential dangers and dependability of each form of marine transportation depending on weather conditions and other factors. These issues are also addressed in in Sections 3.3.3 and 3.3.4. Table 4.2.3–10 lists the estimated travel times, by modes of transit, for Alternatives 1-5. Table 4.2.3–11 lists the summary of consumer costs, reliability, and travel time estimates for Alternatives 1-5. A new section has been added to Section 3.3.4 which describes reports contributed at public meetings of individuals' real life experiences, including concerns related to the potential hazards associated with traveling from King Cove to Cold Bay by the marine alternatives.
	<ul style="list-style-type: none"> <li>It seems that people who are fighting against the road alternatives have no idea of what conditions are in a remote Alaskan village.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Safe travel for anyone is essential; most especially those who do not have the medical facilities, staff, etc.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>There are many stories of family and friends who could not access medical care in time (resulting in death); who suffered and/or lengthened their medical treatment due to the delay in accessing medical care; suffered from the lack of choices for medical care; suffered from the inability to return home for a long period of time; or died in a plane crash trying to leave or return.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>We need a demonstration from the government that our lives count.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>We need peace of mind.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>We think our lives are more important than wildlife.</li> </ul>	See above response.
SER H&S 05	The EIS lacks detail about the numbers and nature of medical emergencies:	The EIS contains all data provided by agencies providing medical services in the area, as it was available. Additional information reported at public meetings has been added to Section 3.3.4, which adds further context to the medical risks encountered.
	<ul style="list-style-type: none"> <li>How many medical emergencies have there been? What kind are they (e.g. age related? Life threatening? Lifestyle related?)</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Have people been made sicker or actually died because of the current situation? How many? Or is it really a matter of convenience to the sick or injured?</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>How many people have died waiting for medical evacuations?</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>How many more people do you estimate will die if the road will not be built?</li> </ul>	See above response.
SER H&S 06	The EIS needs to better describe the potential benefits of the road alternatives. The road would benefit residents by providing an emergency escape route in case of tidal wave or volcanic eruption. It would also allow emergency vehicles from either community to assist the other.	The Service agrees that a road would allow emergency vehicle assistance between the communities of Cold Bay and King Cove, for any purpose. No benefits of any alternative were detected in relief from natural disasters – this has not been included in the EIS.

SOC Code	Statement of Concern (SOC)	Response
SER H&S 07	Additional statistics about health outcomes should be included in the Final EIS:	Health information and medical evacuation services have been included in the EIS in sufficient quantifiable detail to describe health services, including medical evacuations, in the area. A new section has been added to Section 3.3.4 that lists reports contributed at public meetings that detail the risks, challenges, and outcomes of the transportation situation in the area. This provides more context and background for these concerns.
	<ul style="list-style-type: none"> <li>• On average, we lose one to two patients a year due to transfer delays. We have lost children and adults. We have had pregnancy disasters and major trauma.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• We have a challenge keeping health care providers in a stressful environment.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Don Young's office knows of at least 11 occasions when people have died waiting for medical evacuations. There must be more than this.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Of the 32 medical evacuations that were completed, more than half of those were completed in near perfect weather conditions. The other half of those medical evacuations were completed in pretty rough weather, weather bad enough to keep my crew and I from returning home from medical evacuations for over a week.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Would we have longer life expectancies if we have more emergency options?</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The description about 32 medical evacuations that were completed needs more context. More than half of those were completed in near perfect weather conditions. In other words, those patients were lucky. The other half of those medical evacuations was completed in some pretty rough weather. How many medical evacuations could not be completed at all?</li> </ul>	See above response.
SER H&S 08	Elaborate on the level of medical care available in King Cove. The King Cove Clinic is decidedly better equipped and staffed to handle emergencies than the Cold Bay Clinic, and is far better suited than Cold Bay to maintain an emergency in holding while awaiting air transport.	Information on the current level of care available at the King Cove and Cold Bay Clinics is shown in Section 3.3.4. The discussion includes the following statement: Eastern Aleutian Tribes provided additional information regarding the King Cove and Cold Bay Clinics on August 14, 2012, and that information has been added to Chapter 3. The following text has been removed: “The Anna Livingston Memorial Clinic provides a similar level of care as the King Cove Clinic (EAT 2011).”

## Socioeconomic Resources - Land Use, Public Use, Recreation, Visual Resources (SER LAND)

SOC Code	Statement of Concern (SOC)	Response
SER LAND	Comments on the potential change to land use, recreation or visual resources in the project area. Comments related to the quality of lands proposed for exchange (i.e. high quality habitat, or low wilderness values).	Category Code; no response required.
SER LAND 01	The EIS should more clearly display that the lands that would be added to the refuge and wilderness are of lower quality and fail to compensate for the unique values and wilderness character that would be lost from this intact ecosystem. More details to the same argument include:	See response to each of the sub-components of this statement of concern.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The State of Alaska would retain ownership of submerged lands including tidelands, lakes, rivers, and streams. These lands are located to the north of the Izembek National Wildlife Refuge and were not included within the original boundary for obvious reasons: they do not contribute in a significant manner to the habitat values and conservation purposes of the Izembek National Wildlife Refuge. The Draft EIS acknowledges the lower habitat values of these lands: "The southern half is primarily upland habitat and includes areas at higher elevations than any other parcels discussed in the EIS. It likely does not provide much habitat for waterfowl or other water birds. The value of wetlands associated with the state lands are also rated lower: this value is somewhat less than wetlands that are in closer proximity to Izembek and Kinzarof lagoons, which are used more extensively by migratory birds and designated as Internationally Important Wetlands. These lands would in no way "compensate" for the lands and habitats lost to road construction should Alternative 2 or 3 be implemented.</li> </ul>	<p>The EIS (see Chapters 4 and 5) describes the resources and values being considered in the proposed land exchange given the amount of information available. The Service has more detailed information about the lands within the current refuge boundary and does not have comparable information for some of the lands offered for exchange. The EIS provides descriptive information about all the lands involved in the proposed land exchange. Other comments expressed the opposite opinion stating that the offered lands were of high resource value and would more than compensate for the Service lands that would be removed from the refuge. The conclusions drawn in Chapters 2 and 5 represent the best professional judgment of the Service based on the available information regarding the resource values of all lands involved and the impacts to refuge lands and resources from the proposed land exchange. Additional information has been provided in Chapter 4 about the Ramsar site and effects to the Ramsar designation should a land exchange be approved.</p>
	<ul style="list-style-type: none"> <li>The 61,000 acre exchange lands do not provide comparable protection or habitat; they are not ecologically equivalent.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The offered lands would expand the size of the refuge but given that no future threats to fish and wildlife have been identified on these lands the exchange value from a fish and wildlife or wilderness perspective is negligible.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The lands that would be lost from the refuge (206 acres) are essential to the integrity of the refuge and their loss poses the greatest threat to the refuge.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• The value of wilderness diminishes when fragmented; impacts are irreversible.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Nothing could replace the staging area of the entire population of one species, the Pacific Brant.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The lost habitat is significant to the United States and internationally significant wildlife.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The impacts of the road could not be mitigated by the exchange of a larger quantity of land.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The impacts to wilderness land cannot be mitigated.</li> </ul>	See above response.
SER LAND 02	<p>The EIS fails to fully recognize the indirect impacts of the proposed road. The road footprint is only the beginning of the incursions into the wilderness. How other uses develop along such corridors over time are also well documented. These include future expansion of the road system, co-location of future utility systems, trespass traffic off-road (and establishment of unplanned and damaging trail systems and/or informal roads), and construction of support facilities and other structures.</p>	<p>If a land exchange is authorized, most of the concerns expressed in this comment would be addressed by the provisions of the Act as discussed below. These provisions would be carried forward and included as restrictions and reservations in the patent transferring title to the road corridor from the United States to the State of Alaska or in another legally binding document. Note that the restrictions listed below are in law and could only be changed by another act of Congress.</p> <p>Section 6402 (a) states the purpose of the proposed land exchange is for the construction of a single-lane gravel road.</p> <p>Section 6402(f) (2) requires that the Secretary of the Interior transfer the minimum acreage of federal land that is required for the construction of the road.</p> <p>Section 6402(f) (3) directs to the “maximum extent possible” incorporation of existing roads into the</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>proposed corridor.</p> <p>Section 6403 (a)(3)(A) – (D) of the “Act” limits the road to single lane gravel construction with safety pullouts as determined to be necessary connecting King Cove and Cold Bay.</p> <p>Section 6403 (b) prohibits the location of support facilities on the refuge.</p> <p>Future expansion of the road system would not occur as the road as authorized in the Act is limited to a single lane gravel road connecting King Cove and Cold Bay.</p> <p>Co-location of future utility systems would not occur as the Act limits use of the road corridor to a single lane gravel road primarily to be used for health and safety purposes and only for non-commercial purposes.</p> <p>Construction of support facilities and other structures would not occur as the Act does not authorize or make provision for these uses within the road corridor. The Act limits the road corridor to a single lane gravel road to be used for non-commercial purposes.</p>

SOC Code	Statement of Concern (SOC)	Response
SER LAND 03	<p>The EIS does not fully identify the increased hunting (legal and illegal) that would occur due to the new road access. Additional information is needed to estimate future hunting use, including probability of foot travel for hunting access.</p>	<p>The EIS was revised to provide more clarity about the potential change in hunting patterns under each alternative. In particular, see the discussion of bears in Large Mammals Section 4.3.2.5 and waterfowl hunting in Birds Section 4.3.2.4. Ultimately, the quantities or harvest limits are regulated, but the distribution of hunting patterns would change.</p> <p>Subsistence hunting in the refuge is legal. The extent to which a new road would impact subsistence activity (using all-terrain vehicles to subsistence hunt) is addressed in Subsistence Sections 3.3.7, 4.3.3.7, and 4.4.3.7. Bollards or chains are intended to inhibit vehicles from leaving the road, so the distances would be traversed by foot.</p> <p>Incursions beyond the road barriers (Alternatives 2 &amp; 3) by all-terrain vehicles are discussed in numerous sections including the Terrestrial and Aquatic Plant Communities Sections 4.3.2.1/4.4.2.1 and Large Mammals (Bears) Sections 4.3.2.5/4.4.2.5.</p>
	<ul style="list-style-type: none"> <li>• The route of the proposed road goes through the heart of one of the highest densities of brown bears in Alaska. Currently hunting opportunities are liberal. With easy road access to the area, the hunting would have to be restricted. This would impact guided hunting operations and the current largely unlimited opportunity that resident hunters have should they choose to take the extra effort to hunt there.</li> </ul>	<p>See above response.</p>
	<ul style="list-style-type: none"> <li>• Hunters from around the world would be drawn to hunt off of the new road.</li> </ul>	<p>See above response.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>A person described subsistence hunters who own off-road vehicles would like to use new road for hunting- it would be easier to use to access hunting grounds than utilizing the hovercraft, which was frequently unavailable.</li> </ul>	See above response.
SER LAND 04	The Draft EIS fails to account properly for the future impacts of off-road vehicle use. There are already all-terrain vehicle/off-road vehicle incursions into the refuge. The Draft EIS correctly identifies increased impacts of off-road vehicle trails within the existing wilderness and adjacent lands that are apparently a consequence of recent road construction on King Cove Corporation lands. It is entirely likely that expansion of such impacts will occur on the King Cove Corporation lands proposed to be added to the refuge and that these impacts will extend over time to broader areas of the refuge and wilderness if a land exchange and road are approved. Consequently:	The EIS contains the best analysis of the likely effects of unauthorized access by off-road vehicles and discusses the likely effectiveness of bollard and bollard and chain barriers in keeping vehicles on a road.
	<ul style="list-style-type: none"> <li>This would significantly negate many of the claimed benefits that would result from an exchange of lands.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The substantial increase in (legal and illegal) off-road vehicle use in the refuge would have impacts on the character of the landscape and wildlife and wilderness values.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>How would illegal off-road vehicle use be prevented?</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>I do not know an example where a solution was found to prevent off-road vehicle use. During the opening of the Dalton Highway, there were guarantees to restrict access to adjacent lands by the public, but you can see this did not work.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER LAND 05	<p>It is not substantiated that hunting and unauthorized off-road vehicle use would occur. Many of the resource assessments include increased hunting as an implied negative effect without indicating whether the anticipated hunting is actually an increase of projected hunting pressure or simply a redistribution of future hunting pressure. The regulatory authority of the Service to assure hunting harvest levels are consistent with the terms of the Migratory Bird Treaty Act is not discussed. The bag limits are strictly controlled by either the federal government or the state. The basis for the assumption there will be an unquantified but "substantial" illegal use of motorized vehicle travel into the adjacent wilderness is unexplained and unsubstantiated and needs further discussion in the Final EIS about the probability of substantial illegal motorized travel in the wilderness since the bollard-chain barriers on both sides of the road are specifically required by Subtitle E as an engineering design element to prevent illegal use of motorized travel and associated uses such as increased hunting pressure.</p>	<p>Hunting and fishing are likely to occur adjacent to the road under existing and future state and federal regulations. Hunting and fishing currently occur adjacent to the existing road and trail system on Izembek National Wildlife Refuge area. Projected impacts are based upon the best professional judgment of Service and contractor staff with significant experience in the local area and other parts of rural Alaska. It is recognized that the State boards of fisheries and game and the Federal Subsistence Board would likely take action to address impacts to species, if necessary, from increased road access to the refuge. Impacts to non-targeted species from increased human presence are less likely to be addressed by these regulatory bodies. Also, these impacts would be difficult to detect without detailed, monitoring, which may be difficult to conduct, given the limited funds available to manage Izembek National Wildlife Refuge and the overall federal budget picture for the reasonably foreseeable future.</p> <p>Regarding unauthorized off-road vehicle use, experience in the local area, elsewhere in rural Alaska, and in other states has shown that some people will take off road vehicles off the road. Congress recognized this likelihood by specifying that a cable barrier (or other type of barrier) be constructed on each side of the road. Literature cited in the EIS has documented that the most effective ways to deal with vehicle trespass into areas where they are not allowed is a combination of education, physical barriers, and enforcement. Without enforcement, it is extremely unlikely that the physical barriers and education alone will work. As indicated in the EIS, there is no state or federal law enforcement</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>presence in King Cove or Cold Bay. The refuge has documented vehicle trespass into the refuge by vehicles coming from both King Cove and Cold Bay but does not maintain a detailed record of such trespasses. As there are no state or federal law enforcement officials in the area, no citations have been issued as there is no way for the refuge to issue notices of violation for vehicle incidents. Also, tracks left by vehicles are often the main evidence of trespass and the trespassers most often are not observed given the size of the refuge and limited staff. The Service has regularly had problems with illegal off road vehicle use in the Izembek Wilderness from the existing Cold Bay road system. Research and studies conducted in the Yukon Territory, in other states, and personal communications with Alaska resource managers, all indicate that barriers alone, are not effective means of keeping off road vehicles on roads (Sowl, K. and R. Poetter. 2004; U.S.D.A. Forest Service 2001; Forman <i>et al.</i> 1997.)</p> <p>It is impossible to quantify the amount of human use (i.e., hunting, fishing, etc.) or illegal off road vehicle use that would occur adjacent to the road if it is built. The analysis presented in the EIS was based on previous experience of the authors and reviewed by staff familiar with the area and other areas in rural Alaska.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The Draft EIS seems to imply the bollard-chain barrier systems will be ineffective with local residents or visitors illegally using motorized vehicles to damage wetlands. The King Cove Group requested the Service to indicate the number of violations issued by the Service. The Service has not provided any information to support the magnitude of illegal motorized use in the Izembek Wilderness since its establishment in 1980. Likewise, the Service has not indicated any problem with illegal all-terrain vehicle use in the Izembek Wilderness that adjoins the Frosty Peak Road and other trails shown in Draft EIS Figure 3.3-19.</li> </ul>	See above response.
SER LAND 06	<p>The importance of the proposed road to the State of Alaska and the people of King Cove is understated in the EIS, as is the equitable or more than equitable values of the land exchange. Alternative 2 is the most responsible choice because it brings invaluable new lands into the public domain and represents the most equitable solution for the Aleut shareholders of the King Cove Corporation. This is one place where the Department of the Interior can get it right, where it is possible to accommodate the land use needs of an indigenous people AND add significant acreage to the nation's publicly owned wetlands and wilderness. We are willing to accept reasonable regulations on how, who, and when the road can be used.</p>	<p>It is not possible to compare the proposed Izembek land exchange with other exchanges involving federal lands in Alaska. Land exchanges in Alaska have been either directed by specific Congressional legislation or conducted as required by regulation and statute. Non legislated land exchanges are required to be of equal monetary value based upon fair market value derived from a market value appraisal meeting federal appraisal standards conducted by an appraiser meeting federal qualifications.</p> <p>Each legislated land exchange is different in detail and intent dependent on the lands proposed to be exchanged, the benefit the proposing party wishes to obtain and requirements that maybe included in the legislation.</p>
	<ul style="list-style-type: none"> <li>We find no other example of such a generous exchange considering that all we ask in return is 206 acres of land on which to construct a one-lane gravel road.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Alternative 2 will result in 56,000 acres of pristine land transferred to the federal government; more than 45,000 acres of this land exchange will be designated as new wilderness. The creation of more than 45,000 acres of new wilderness was not acknowledged appropriately in the Draft EIS. There will be a net increase of 13,563 acres of unique and high value wetlands (a ratio of 1:1,043 acres for the 13 acres transferred, or 1:3,563 acres for the 3.8 acres of wetland fill).</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>It is a fair trade. These are traditional lands used by our ancestors, and we are willing to relinquish them because this road means that much to us. Representative of how important emergency access is to us, it is 20 percent of King Cove Corporation land or an exchange ratio of more than 200 to 1. That is not to say that we do it without some pain because of the value of what we are giving away.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Only 7-9 miles of the proposed road will be within the present "designated wilderness" of the refuge and much of that right-of-way dates back to the war.</li> </ul>	See above response.
SER LAND 07	Izembek National Wildlife Refuge sees very low use even compared to many other refuges in Alaska. It could support more public use and access without significant impacts to its original purpose.	Every refuge has ecological features that draw visitors. The Izembek National Wildlife Refuge area is relatively remote, which contributes to lower usage. Public Use (Section 3.3.6) describes a steady increase in visitor traffic each year.

SOC Code	Statement of Concern (SOC)	Response
SER LAND 08	The EIS should more clearly identify the beneficial impacts of proposed land management and new land uses that would result from a land exchange and road. All lands surrounding Kinzarof Lagoon will be designated as wilderness, giving greater protection to Steller’s Eider, northern sea otter, and the shoreline that exists presently with public boat launch facilities and motorized access points. There would also be significant positive effects to high value wetlands. New land uses would include wildlife watching, particularly birds; driving the road for pleasure; increased tourism, including tours conducted by the Service along the road, and it would be easier to go hunting. King Cove Corporation shareholders could access their lands at Mortensens Lagoon and Thinpoint Lake more easily than by boat or plane.	The Land Use sections (4.3.3.1; 4.4.3.1; 4.5.3.1; 4.6.3.1) do not describe land use changes as “beneficial” or “adverse” impacts. Instead, the description of the change in land management regimes is provided, including allowable uses. Descriptions of new impacts to species under each alternative appear in Chapter 4.3.2. The Public Use sections 4.3.3.6 and 4.4.3.6 have been revised to include use changes, particularly to note that hunters or wildlife/bird watchers may choose to walk to Kinzarof Lagoon from the road.
SER LAND 09	The EIS should more clearly identify the adverse impacts and new land uses that would result from a road. Some types of tourism could increase, disturbing wildlife and destroy wildlife habitat, while some types of tourism could be reduced due to changes in wilderness. Impacts could include additional hunting and unintentional fires.	The Land Use sections (4.3.3.1; 4.4.3.1; 4.5.3.1; 4.6.3.1) do not describe land use changes as “beneficial” or “adverse” impacts. Instead, the description of the change in land management regimes is provided, including allowable uses. Descriptions of new impacts to species under each alternative appear in Chapter 4.3.2. The Public Use sections 4.3.3.6 and 4.4.3.6 have been revised to include use changes, particularly to note that hunters or wildlife/bird watchers may choose to walk to Kinzarof Lagoon from the road.  See SER LAND 03 for further discussion on hunting patterns.

SOC Code	Statement of Concern (SOC)	Response
SER LAND 10	<p>An objective evaluation of the land exchange and road proposal cannot be achieved by considering only the amount of land that would be removed from the refuge versus the amount that would be added. An alternate technique to evaluate land exchange must consider the quality of the lands to be exchanged; the total impacts of road construction, operation, and maintenance, as well as the individuals or entities who will bear these costs; and the effects of increased public use, both legal and illegal, that would occur within the most vital area of the Izembek National Wildlife Refuge and Izembek Wilderness. These impacts must be considered together with the lower quality of the lands that would be added, the lack of credible threats to these lands for the foreseeable future, existing protective benefits of Section 22(g) that would continue if the King Cove Corporation lands and selections were not transferred, and the fact that some of the lands to be added would come with less than ideal capability for protection, such as submerged lands remaining in state ownership and some lands with the subsurface remaining in Aleut Corporation ownership.</p>	<p>The Service recognizes that Section 22 (g) and 50 CFR 25.21 provide a degree of “protective benefits” as the comment states. A detailed discussion of Section 22 (g) can be found in the response to comments in REG 10.</p>

SOC Code	Statement of Concern (SOC)	Response
SER LAND 11	<p>The value of the lands proposed for the land exchange is not equally and fairly evaluated in this Draft EIS. It is not easy for the public to see how valuable the exchange lands are (for Alternative #2) and how compelling the trade is. In general the Draft EIS under represents the state and King Cove Corporation land values involved in the proposed land exchange.</p>	<p>The Service agrees that the evaluation of the lands proposed for exchange needs to be revised. Of the 50,000 acres the Service would receive in a land exchange, the parcels with the highest habitat and wildlife values have an existing degree of protection under ANCSA Section 22(g) (as discussed in a response to other comments contained in REG 10) that was not considered in the evaluation. It is likely that re-evaluation of the value of these lands to the United States in a land exchange would be much less than currently described. Additionally, the value placed on King Cove Corporation's relinquishment of its selection of 5,429.67 acres within the Izembek Wilderness Area, would be less for the same reasons. If the parcel were to be conveyed to King Cove Corporation, conservation benefits attributable to Section 22(g) lessen the value of King Cove Corporation's relinquishment of the selection, particularly for the wetlands areas within the parcel.</p>
	<ul style="list-style-type: none"> <li>The Draft EIS consistently ignores the function and value of habitat of the 4,300 acres of state water and submerged land including 17 miles of intertidal shoreline and 2,300 acres of eelgrass habitat that will be added to the Izembek State Game Refuge and managed like state waters, submerged land, eelgrass habitat and intertidal shoreline that comprise the Izembek Lagoon and Moffet Lagoon (Izembek Lagoon complex). Except for wetlands, the Draft EIS does not describe the resources associated with the other land exchange parcels which lack a consistent description of acres of habitat that allows a relative comparison with the same resource described in detail for the two road corridors.</li> </ul>	<p>See BIO T&amp;E 01 for discussion of new language regarding the benefits of additions to the Izembek State Game Refuge.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Environmental groups offered to purchase Mortensen's Lagoon (all the way down to Thinpoint Lake) to give to the Service because of their wilderness values. This is evidence that the lands to be considered as part of the exchange are valuable.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• If title is transferred to the Service, the state and King Cove Corporation lands, their potential development, recreational use opportunities and other important values will be affected. The Final EIS must address these potential impacts. If a land exchange is authorized and large tracts of land are designated as wilderness, public use of these lands will be dramatically different than what is currently allowed under state management; this important distinction must be captured in the Final EIS. The Final EIS needs to include an analysis of the lost opportunity for revenue that could have been generated from development (e.g., oil, gas, recreation) on King Cove Corporation and State of Alaska lands.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The Draft EIS gives the impression that the non-federal lands involved in the exchange lack potential for development. This assumption is incorrect, especially regarding the corporation lands that enjoy all the attributes of private landownership.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER LAND 12	(Page 3-207) The Bristol Bay Area Plan discussion appears to minimize the 1985 Bristol Bay Management Plan effort. The EIS should provide a brief summary of the state and federal governments' perspective on this plan.	<p>The reference is for the 2005 Bristol Bay Plan for State lands, not the 1985 <i>Bristol Bay Regional Management Plan and Final Environmental Impact Statement</i>. The latter document is referenced only in Chapter 1, Section 1.6.2.1. As the 1985 plan was never finalized and is now close to 30 years old, it is most useful as a historical reference. The 2005 Bristol Bay Regional Management Plan is current and provides management direction for State lands and waters in the Bristol Bay area as described in Section 3.3.1.2 and is referenced 20 other times in Chapter 3 as a source of information on state lands and management direction.</p> <p>The Alaska Department of Fish and Game provided general fish and wildlife resource information during the development of the Bristol Bay Area Plan.</p>
SER LAND 13	The Final EIS should more fully address the cumulative effect of the alternatives on future land use on the state and King Cove Corporation parcels, not just the federal ownership in the road corridors. The Final EIS should re-examine the conclusion that there will only be a cumulative "minor" effect for the 8,093 acres of the Mortensens Lagoon parcel. Not only is this parcel directly accessible by road from the City of Cold Bay, but it is not subject to the provisions of ANSCA Section 22(g). While the analysis for reasonably foreseeable future actions is 5 to 10 years, the exchange would be a permanent action, forever foreclosing any energy related facility to be constructed on state lands. The potential for existing ownerships to serve future commercial recreation services should also be evaluated.	Analysis of cumulative impacts is based on activities that are reasonably foreseeable. No reasonably foreseeable activities have been identified that involve energy facilities or commercial recreation. Cumulative impacts do not include opportunity costs of speculative activities.

SOC Code	Statement of Concern (SOC)	Response
SER LAND 14	The EIS should better describe existing land uses and the effects of those land uses. For example, what is the effect of the 50 miles of existing, public accessible roads that the Service manages? They intersect caribou migration points.	Existing public roads are identified in the Transportation Section 3.3.3. Although we have not found any studies about the effects of existing roads on caribou within or in the vicinity of Izembek National Wildlife Refuge, we have cited numerous studies related to the interaction of roads, human use of those roads and caribou in Alaska and Canada, within Chapter 4 Section 4.3.2.5.
SER LAND 15	The following effects to Land Use should be modified in the Final EIS:	See response below.
	<ul style="list-style-type: none"> <li>• Alternatives 2 and 3 will have a major positive effect on land use in the Izembek National Wildlife Refuge and Alaska Peninsula National Wildlife Refuge because a net of 56,193 acres will be transferred to federal ownership to be managed as part of the National Wildlife Refuge System.</li> </ul>	<p>The beneficial or adverse impacts tied directly to the acreages associated with the proposed land exchange in Alternatives 2 and 3 cannot be directly compared to one another. While there would be a large amount of acreage added to the National Wilderness Preservation System, this would not offset the habitat fragmentation of bisecting of wilderness lands in the isthmus of Izembek National Wildlife Refuge. The issue is around the fragmentation of wilderness, not the numbers of acres being added to or removed from wilderness. In addition, the large acreage being offered in exchange would not offset the loss of habitat and secondary impacts associated with road construction on the isthmus. The EIS (see Chapters 4 and 5) describes the resources and values being considered in the proposed land exchange given the amount of information available.</p> <p>The addition of the Kinzarof Lagoon to the Izembek State Game Refuge would provide greater protection for tidelands and submerged lands, including eelgrass beds, and marine water that provide habitat for Steller's eiders, emperor geese and other waterbirds; harbor</p>

SOC Code	Statement of Concern (SOC)	Response
		<p>seals; and various species of fish. The Alaska Department of Fish and Game would use the Izembek State Game Refuge Management Plan to manage land use activities in the lagoon, including a requirement for a Special Area Permit for any activity that may damage refuge resources, disturb wildlife or disrupt existing public uses Management of species harvest would be unaffected by the change in land status from general state land to refuge land. However, the Izembek State Game Refuge plans states that the Alaska Department of Fish and Game will work with the Department of Natural Resources to prepare mineral leasehold location orders for the Izembek State Game Refuge, and also recommend that the Department of Natural Resources not offer offshore prospecting permits or leases within the refuge. The departments will recommend that the legislature close the refuge to new locatable mineral entry, mineral prospecting, and mineral leasing under AS 38.05.185-38.05.300.</p>
	<ul style="list-style-type: none"> <li>• Alternatives 2 and 3 will have a major positive effect on land use because a net of 49,790 acres will be added to the National Wilderness Preservation System.</li> </ul>	<p>See above response.</p>
	<ul style="list-style-type: none"> <li>• Alternatives 2 and 3 will have a speculative, but major unknown negative effect on the future land use of 5,430 acres of replacement land in the Alaska Peninsula National Wildlife Refuge.</li> </ul>	<p>See above response.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Alternatives 2 and 3 will have a major negative effect on the King Cove Corporation potential to use 16,126 acres of land donated to the federal government forever, not just the next 5 to 10 years, in return for a safe, reliable, and affordable transportation between the City of King Cove and the Cold Bay Airport.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Alternatives 2 and 3 will have a major positive effect on land use involving up to 15,560 acres of wetlands including 4,282 acres of state ownership with its 2,300 acres of eelgrass beds and 17 miles of intertidal shoreline, to be managed as a part of the Izembek State Game Refuge in the same manner as are state ownerships comprising the Izembek Lagoon complex.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Alternatives 1, 4, and 5 will have a major negative effect on land use on 5,430 acres with its unique resources that will be removed from the National Wilderness Preservation System.</li> </ul>	See above response.
SER LAND 16	The Service should adequately describe the exchange lands and their values, similar to what was begun for the proposed Yukon Flats land exchange. This process should be complete and disclosed to the public in the Final EIS.	<p>The Service disagrees with this comment and believes that the lands that would be included in a land exchange have been “adequately” described. The descriptions in the EIS were written based upon the best available information and personal knowledge of Service personnel.</p> <p>The authority to value and the benefit of a valuation of these lands is discussed in the response to other comments in DATA 28.</p>

SOC Code	Statement of Concern (SOC)	Response
SER LAND 17	<p>The conclusion that the land exchange as a whole would have a major impact is excessive and does not seem to match the data provided in this section. The Service receives approximately 50,000 acres in exchange for approximately 206 acres of refuge lands. The lands received by the Service are within or adjacent to existing Izembek or Alaska Peninsula National Wildlife Refuge lands. The overall benefit to the refuge system should be beneficial. [Draft EIS p. 4-179 4.3.3.1 Land Ownership Direct and Indirect Summary] and [Draft EIS p. 4-180 4.3.3.1 Land Ownership Cumulative Impact]</p>	<p>The Service disagrees with this comment. Of the 50,000 acres the Service would receive in a land exchange, the parcels with the highest habitat and wildlife values have an existing degree of protection as discussed in a response to other comments contained in REG 10. The discussion of the habitat and wildlife values of the remaining parcels support the conclusions of this section.</p>
SER LAND 18	<p>After determining the ecological and wilderness values of the lands subject to exchange, look at the land trade from a managerial perspective. Do they make sense? The Kinzarof Parcel would be of marginal value owing to its proximity to the roads system, and the Mortensen's Lagoon Parcel would be split from the rest of the refuge. The parcels selected for transfer to King Cove Corporation within the Izembek and Alaska Peninsula National Wildlife Refuges already are protected under 22(g), and the Aleut Corporation would get subsurface rights elsewhere that would become a future problem.</p>	<p>The Service recognizes that Section 22 (g) and 50 CFR 25.21 provide a degree of “protective benefits” as the comment states. A detailed discussion of Section 22 (g) can be found in the response to comments in REG 10.</p>

SOC Code	Statement of Concern (SOC)	Response
SER LAND 19	The Final EIS should incorporate the following edits to the Land Use sections Executive Summary through Chapter 2:	Comments generally requested additional analysis of impacts of land ownership issues, specifically in the determination of impact criteria and issues associated with the RCA Alaska Communications Inc., parcel. The Service determined that current impact assessments for land ownership under Alternative 2 and Alternative 5 are adequate based on the criteria outlined in Section 4.3.3.1 and 4.6.3.1. The Service has declined to incorporate the third bullet point. Language in Section 3.3.1 currently states that the designation of the Kinzarof Lagoon for the Izembek State Game Refuge will occur, “pending approval of the land exchange, as required by the Act.” The Service agreed that impacts to land ownership resulting from lands to be added under the exchange required additional analysis. Revisions have been made to Sections 4.3.3.1 and 4.4.3.1 to further evaluate the impact of land ownership changes resulting from the land exchange. The Service does not anticipate the use of eminent domain to obtain additional authorization for use of the RCA Alaska Communications Inc. parcel. The Service has not adopted the suggestions regarding the RCA Alaska Communications Inc. parcel.
	<ul style="list-style-type: none"> <li>• [Draft EIS ES-23 Alternative 2] Eliminate "major" effects in Paragraph 2 of this page [to Land Ownership and Public Use]. The original Service analysis was a minor effect and nothing has been presented to warrant this change.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS ES-23 Alternative 5] How is the effect of eventual conveyance of over 5,000 acres of wilderness land to a private corporation a negligible to minor effect while the conveyance of 206 acres in return for 63,000 acres is not considered negligible to minor or positive?</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS Page 3-198, 5th full paragraph] At the end of the 2nd sentence add the following: The Kinzarof designation as a State Game Refuge does not take place unless the land exchange is completed.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS Table 24. Effects to Public Use under Subtitle E] Incorporate the comments from the table on page 72-74 of the King Cove Group Consolidated Comments.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS Page 3-202 Paragraph re: RCA Alaska Communications Inc. Parcel] Add the following at the end of the last sentence: "or obtained by eminent domain as necessary."</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS Chapter 2, Page 2-27, Sec. 2.4.2, Paragraph 4] The Service needs to evaluate if the RCA Alaska Communication, Inc. parcel along the road routes would authorize use, upgrades, and maintenance of the proposed road. Or the Service needs to develop an alternate route around this parcel. Evaluate for the Final EIS.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER LAND 20	The Final EIS should incorporate the following edits to the Land Use sections Chapter 3:	The Final EIS incorporates the following edits to the Land Use sections Chapter 4:
	<ul style="list-style-type: none"> <li>• [Draft EIS Chapter 3 and globally] Add the following in the paragraph discussing Mortensens Lagoon, "Under ANILCA, ANCSA land is not a part of the refuge and management policies of either the Alaska Peninsula or the Izembek National Wildlife Refuge do not apply to these private ownerships."</li> </ul>	[Chapter 3 and globally] Land Ownership Section 3.3.1.1 and Public Use Section 3.3.6.5 have been revised.
	<ul style="list-style-type: none"> <li>• [Draft EIS Chapter 3, Page 3-194, Sec. 3.3.10, Paragraph 2] ANILCA Section 303(3) did not simply rename the Range, it "re-designated" the Range as the Izembek National Wildlife Refuge. We request the following rewrite consistent with pages 12 and 19 of Chapter 1. The Range was (re-designated) Izembek National Wildlife Refuge in 1980 by the ANILCA, Public Law 96-487, and approximately 300,000 acres of the refuge was designated as wilderness.</li> </ul>	[Sec. 3.3.10] Accepted; text revised.
	<ul style="list-style-type: none"> <li>• [Draft EIS Chapter 3, Page 3-196, Sec. 3.3.1, Paragraph 1] The state was not aware that the Service would retain an interest on Sitkinak Island for the road right-of-way. The documents say, "This interest would not be extinguished unless specific action is taken to release it." Elaborate on this. Why and for what purpose would the Service retain a road right-of-way?</li> </ul>	Section 3.3.1 has been revised. The right of way mentioned in the comment is a 44 LD 513 designation predating the Federal Land Policy and Management Act, put in place by BLM. Prior to Federal Land Policy and Management Act, federal agencies could not grant another federal agency a right-of-way or other interests in land. The 44 LD 513 designation substituted by establishing a land use "authorization" that existed for as long as the agency used the subject land and associated improvements. With the passage of ANILCA, BLM transferred the jurisdiction for 44 LD 513's within refuges to the Service. In the event of a land exchange and transfer of the Sitkinak parcels to state ownership, the Service will remove the 44 LD 513.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Draft EIS [3-202 3.3.1.2 Federal Aviation Administration Parcels] The last sentence says that the Federal Aviation Administration has primary management authority for the land and the Service has secondary management authority. Under the land exchange, will the Service no longer have a secondary management authority of the Federal Aviation Administration lands acquired for a road? This needs to be clarified in the text.</li> </ul>	<p>Section 3.3.1.2 has been revised. Under a land exchange, the Service would authorize a right of way for a road corridor or include the road corridor as part of the land exchange. See REG 20 for more detail.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS Chapter 3, Page 3-300, Sec. 3.3.6, Paragraph 4] What will happen to the Mortensens Lagoon cabins if the Service gains ownership of this parcel? Address in Final EIS.</li> </ul>	<p>Public Use Section 4.3.3.6 has been revised to include discussion of the future use of the Mortensens lagoon cabins. If existing cabins are acquired along with land at Mortensens Lagoon, the Service would have several options to consider, including issuing permits to use the cabins for subsistence purposes, establishing the cabins for public use, using the cabins for administrative purposes, or removing the cabins, all in accordance with regulations at 50 CFR 36.33. Some of the discussed actions would also require amending the Refuge's comprehensive conservation plan.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 3-209] Add the following: "Section 1039(c) of ANILCA states that ANCSA land within a Conservation Unit is not part of the refuge".</li> </ul>	<p>Although reference to ANILCA Section 1039(c) was likely a typographic error, a search of ANILCA for variations, such as 103(c) did not find the quoted language. It was noted in the EIS that King Cove Corporation lands within the National Wildlife Refuge boundary are private property, on which the King Cove Corporation has exclusive ability to control public access. King Cove Corporation development of lands subject to ANCSA 22(g) is subject to a compatibility determination by the Refuge Manager (See REG 10).</p>

SOC Code	Statement of Concern (SOC)	Response
SER LAND 21	The Final EIS should incorporate the following edits to the Land Use sections Chapter 4:	<p>Text revisions have been incorporated in Section 4.3.3.1. Section 811(b) of ANILCA allows the use of "snowmobiles, motorboats, and other means of surface transportation traditionally employed" for subsistence purposes. This may involve the use of certain "motorized vehicles," but not all and has been addressed on a case by case basis as needed on Alaska Refuges. ANILCA also provides that this access is subject to reasonable regulations.</p> <p>The use of all-terrain vehicles or off-road vehicles for subsistence is confined to certain trails by tradition and agreement but formal regulations have not been promulgated for most of the Izembek National Wildlife Refuge.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS Chapter 4, Page 4-128, Sec. 4.3.2.3, Paragraph 6] This area is not confined to foot travel. Subsistence users are permitted to use approved motorized vehicles in wilderness as authorized by ANILCA. Remove the statement.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS Chapter 4, Page 4-176, Sec. 4.3.3.1, Paragraph 7] This section needs to incorporate a discussion about the Generally Allowed Uses on State Land, regarding travel across state land, access improvements to state land, removing or using state resources, etc. The State of Alaska Fact Sheet titled Generally Allowed Uses on State Land language should be incorporated. This document is provided as an enclosure to the state's comments.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS Chapter 4, Page 4-176, Sec. 4.3.3.1, Paragraph 3] Sitkinak Island parcels transferred to the state would need to be free of contamination and would be managed under the Kodiak Area Plan. This plan could be amended to address management changes needed to protect newly acquired harbor seal habitat. The parcels on the main island would be classified as Grazing and Settlement. The spit would likely be classified as General Use. Suggested replacement text: "Under the exchange effected by Alternative 2, these lands would be transferred to the State of Alaska for management under the Kodiak Area Plan, including any plan amendments. The parcels on the main island would be classified as Grazing and Settlement. The spit would likely be classified as General Use or Wildlife Habitat."</li> </ul>	See above response.
SER LAND 22	The Final EIS should incorporate the following edits to the Public Use sections:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>For the same reasons described under Land Use, there should be an overall major positive effect on public use under Alternative 2 or 3.</li> </ul>	The effects on public use are neither beneficial nor adverse, but the changes in public use are described.
	<ul style="list-style-type: none"> <li>Addition to, or retaining, federal ownership of 16,126 acres of private lands, will have a major positive effect on public use because the King Cove Corporation will forego forever the opportunity to have exclusive control over public use on private lands.</li> </ul>	The effects on public use are neither beneficial nor adverse, but the changes in public use are described.
	<ul style="list-style-type: none"> <li>Include a projection of reasonably expected increase, if any, in public use on the lands exchange where ownership is permanently changed as a direct result of Alternative 2 or Alternative 3.</li> </ul>	The document describes that the Service expects steady increases in visitors to the refuge in all alternatives.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 2-71 Public Use/Cumulative Effects Alternative 2 and 3] The effects to the public use of the areas are major (beneficial). Addition of private land in federal ownership is clearly beneficial to public use. This need to be reflected in the graph.</li> </ul>	<p>The effects on public use are neither beneficial nor adverse, but the changes in public use are described.</p>
	<ul style="list-style-type: none"> <li>• The Draft EIS needs to provide a graphic with the 17(b) easements shown in relationship to the existing transportation system</li> </ul>	<p>Mortensens Lagoon and Kinzarof Lagoon are bounded by an unsurveyed ANCSA Section 17(b) easement. These easements would be extinguished if the land exchange were completed.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 3-293 Public Use] The Service should clearly state that the waters, submerged land, eelgrass beds and intertidal shoreline of both Kinzarof Lagoon and Izembek-Moffett Lagoons are in exclusive state ownership.</li> </ul>	<p>The Land Ownership and Use Section 3.3.1 indicates that, with few exceptions, the state owns the surface and subsurface estate of all tidelands and submerged lands along its coastline, and the beds of navigable waters within its boundaries. The Public Use Section 3.3.6.2 indicates the Izembek State Game refuge includes the submerged lands and navigable waters managed by the state.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 4-85-Public Use] Negligible is the wrong category for evaluation of effect on public use. The effect is permanent and observable. This qualifies as major under page 4-4 criteria.</li> </ul>	<p>The EIS indicated that the effect for Alternatives 4 and 5 is “perceptible” and therefore low magnitude/intensity. We agree the permanent duration raises the summary impact to “minor” instead of “negligible.” The change has been made to the document.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Investigate the projected increases in human populations in the communities of King Cove and Cold Bay, and to determine how prevalent hunting, for example, is in those communities. Likewise, some assessment of projected levels of visitors to the area in the future, based on historic trends and focusing on those visitors who hunt, would be helpful. With this information, the Service could determine, at least roughly, how likely it is that an increase in human outdoor activities would occur in the region in the foreseeable future. Important questions to be asked in this regard are (1) whether hunting pressure, for example, is expected to increase substantially based on an a projected increase in human presence in the area, or (2) whether hunting pressure might increase less because the populations of residents and visitors are expected to remain relatively stable.</li> </ul>	<p>The EIS was revised to provide more clarity about the potential change in hunting patterns under each alternative. In particular, see the discussion of bears in Large Mammals Section 4.3.2.5 and waterfowl hunting in Birds Section 4.3.2.4. Regardless of human population dynamics, harvest is regulated. Hunting patterns may change as points of access change or wildlife populations move.</p>
SER LAND 23	<p>The Service should work with Alaska Department of Fish and Game to ensure that Figure 1-2 properly shows the State Game Refuge boundary. Currently the DEIS states "...extension that reaches as much as 3 miles seaward..."; however, it may only be one mile. [Chapter 1, Page 1-21, Sec. 1.6.3.2, Paragraph 1].</p>	<p>The Service has coordinated with the Alaska Department of Fish and Game as requested and confirmed the information incorporated from the Izembek State Game Refuge Management Plan is correct.</p>

## Socioeconomic Resources – Public Revenue and Fiscal Considerations (SER REV)

SOC Code	Statement of Concern (SOC)	Response
SER REV	Comments related to the use of public/taxpayer money for the project, the funding source for implementation of alternatives including road construction and operation, as well as the overall impacts to the region's economy. Comments related to the analysis of costs of the alternatives.	Category Code; no response required.
SER REV 01	The Service should consider that large amounts of money were spent previously for marine links between Cold Bay and King Cove that have proven successful in medical situations. For the cost of building and maintaining the road, these marine links could be sustained.	The Fish and Wildlife Service has considered all factors, including the cost and efficacy regarding medical evacuations, for each alternative.
SER REV 02	The Draft EIS fails to present a benefit-cost analysis of the proposed alternatives which is how federal agencies should establish whether or not a project generates net public benefits from a social perspective. Analysis should include mineral potential for the state parcels involved in the land exchange, and the potential loss of opportunities to generate revenue from the lands if they become designated wilderness. Opportunity costs of time associated with longer trip lengths should also be considered. The costs of the Izembek Road Project likely exceed benefits by a factor of 7 in the most optimistic scenario.	The components of an EIS are described in Part 1502 of the National Environmental Policy Act. Section 1502.23 concerns cost-benefit analyses: For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations. The EIS inventories social and cost considerations, and estimates the impacts of each alternative. It should be noted that the EIS' primary focus is to evaluate the impacts of a land exchange in accordance with the Act. Alternative 1 has been revised due to the Aleutians East Borough's decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The Aleutians East Borough has already terminated hovercraft service and has stated that it has no plans to resume service in the foreseeable future and so this effect would not be causally related to the road, should it be constructed, and is thus inappropriate for consideration in a benefit-cost analysis that is designed to address incremental impacts of the road.</li> </ul>	See above response.
SER REV 03	The Service should clarify how it calculated the costs to build the road for Alternatives 2 and 3. The cost of the road discussed in the Draft EIS needs to include: expenses to ship gravel/construction materials, the cost of the uncompleted road from Lenard harbor, the cost of law enforcement for the road, procurement of maintenance equipment, treatments for dust palliative, and expenses for increased federal land management.	The potential cost to ship gravel/construction materials is clarified in the last bullet item of ‘Components’ in Section 2.4.2 and 2.4.3. For cost comparison, we assume the road from Lenard Harbor to the Northeast Terminal is complete. On an engineering site visit, it was observed that road material retains moisture due to the moist environment. Increased impact management costs for federal management and law enforcement are anticipated but unquantified at this time.
SER REV 04	The Service should take into consideration that the cost and maintenance of a road is frequently under-budgeted, and the proposed road is likely economically unsound, especially for a road that would be impassable for much of the year. Funds would be better spent on other things. The road is not justifiable economically or environmentally.	The Fish and Wildlife Service has considered all factors, including the cost and maintenance of the road alternatives. The concern about the best use of public funds is noted.

SOC Code	Statement of Concern (SOC)	Response
SER REV 05	Clarify how the cost estimates for the hovercraft and ferry were developed. Explain why the numbers presented for cost and ridership are different than the 2003 EIS. Include the cost of the vessels, and the expense of staff for 24/7 emergency service and where the staff would live.	Cost, ridership, and trip projections were regenerated and updated in the EIS. Some of the 2003 EIS data was based on data from 1999 sources, which had become outdated. Projections about ridership and trips, as made in the 2003 EIS were not realized in ensuing years. Historical operating data was available in 2012, which was not available in 2003. Cost components are presented in detail in Chapter 2 for all alternatives, and again in Sections 3.3.2 and 3.3.3. Crew costs are included in operating costs. Crew housing was not considered in the evaluation for any transportation option. Chapter 2 has been revised to include assumptions that were used to develop costs.
SER REV 06	It may be in King Cove's best interest to use the federal grant to build a good marine link from Lenard Harbor to Cold Bay instead of that road north. Congress should also look at this in its role of grant oversight.	Alternative 5 represents a marine link from Lenard Harbor to Cold Bay. The King Cove Access Road project is already funded and underway.
SER REV 07	Include the cost of medical evacuation service (\$30,000 per evacuation) in the analysis.	The average cost of medical evacuations is described in Sections 4.2.3.3 and 4.2.3.4. The average is about \$3,000.
SER REV 08	It is expensive for the residents of King Cove and Cold Bay to travel by airplane and hovercraft, particularly expensive for families, and driving on a road would be more cost effective. There is also a cost associated with unused tickets and waiting away from home for the weather to enable travel. Ground travel is also less costly for commercial interests.	Costs of travel are shown in Chapter 4 under each alternative (Socioeconomics). The savings associated with shared rides is also incorporated, for either private or commercial passengers. There is insufficient data to estimate the cost of unused/changed air tickets, but it is noted as a concern.

SOC Code	Statement of Concern (SOC)	Response
SER REV 09	Considering the current situation of the national economy, it does not make sense to spend federal money (and therefore, taxpayers' money) on a road that will be used by few people and be harmful to the refuge. Federal Highway Administration policy does not endorse projects whose life cycle costs exceed benefits.	The components of an EIS are described in Part 1502 of the National Environmental Policy Act regulations Section 1502.23 concerns cost-benefit analyses: For purposes of complying with the Act, the weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis and should not be when there are important qualitative considerations. It should be noted that the EIS' primary focus is to evaluate the impacts of a land exchange in accordance with the Act. The commenter's concerns about the national economy are noted.
SER REV 10	The cost of building and maintaining the road will not burden the taxpayer.	The context of this comment indicates that the commenter believes that the cost to US taxpayers is not as important as the well-being and safety of the Aleut people. Comments such as this one have been added to the Public Health and Safety section.
SER REV 11	The cost of building the road is cheaper than the cost of the hovercraft or ferry alternatives. The economic benefits that would be created by the proposed road do justify the cost of construction and maintenance. Jobs may be created from construction and maintenance of the road, policy enforcement, and use of the road for fisheries, tourism, and the overall enhancement of the infrastructure.	The cost, direct and indirect employment, and development that could be created from construction and maintenance of a road are estimated in the EIS in Chapter 2, and in the Socioeconomic Sections.
SER REV 12	The Draft EIS fails to account the loss of passive use values associated with the conversion of pristine wilderness and refuge land into a road corridor. Passive use values represent an individual's willingness to pay for protecting a resource, even if they may never use it in any way. Estimated passive use damages represent a present value cost of \$1,157,473 for Alternative 2 and \$1,307,196 for Alternative 3.	The Service did not include a passive economic valuation as part of this EIS because of the limitations of methodologies in the approach. Non-use or passive values have been estimated by others, including the Wilderness Society, and have been reviewed by the Service.

## Socioeconomic Resources – Road Design, Bridges, Transportation, Planning and Transportation Systems (air, water and road) (SER ROAD)

SOC Code	Statement of Concern (SOC)	Response
SER ROAD	Comments on the details of the road design and its connection to other roads; comments related to road maintenance and plowing; comments related to impacts to historic area roads; comments related to other types of transportation systems.	Category Code; no response required.
SER ROAD 01	The assumption in the Draft EIS that a road would almost always be available, assuming regular timely maintenance, does not appear to be substantiated for this region. A road would not be a practical, year-round solution because it will be costly to build and dangerous when it is in operation because of:	<p>A road would be available for travel at most times, assuming adequate maintenance. Hazardous conditions are common in the Alaska winters, and they could lead to occasional closure of the road, possibly a few days per year. A vehicle convoy for emergency travel, led by a pilot vehicles is a common practice during windy, foggy, or blizzard conditions.</p> <p>Marine and air transportation have more limited options because there are sometimes no alternatives except to wait for better conditions. Climate change is difficult to quantify for any alternative, but would affect all alternatives.</p> <p>Maintenance costs have been revised throughout all alternatives to reflect the highest level of road maintenance for planning purposes.</p> <p>Engineering a road to withstand the elements and terrain, are, within this analysis, feasible.</p> <p>No specific edits have been made in regard to this comment, but updates have been made to maintenance costs in Chapter 2.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Severe weather (e.g. high winds average wind velocity in Cold Bay is 17mph); the project area has a harsh environment much of the year</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Climate change (more frequent and stronger storms, changing water levels) will result in more extreme weather along the road;</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Steep terrain/slopes (that could cause avalanche), wetland depressions, unstable volcanic soils</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Persistent fog, year-round</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Frequent winter storms would cause icing, drifting, slides, and blowing snow that reduces visibility to near zero at times</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Plowing snow does not affect visibility</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• The ability of local road maintenance equipment to keep a new road open in addition to maintaining existing transportation corridors (airports, existing roads, public parking, etc.)</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Building and maintaining a road north from Lenard Harbor to the edge of the Izembek National Wildlife Refuge and Izembek Wilderness would be extremely difficult because of the soils, avalanche terrain, and recurring bad weather.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 02	<p>The 100-foot road corridor width should be cited as an "average" width that can be adjusted up or down as dictated by the final engineering design.</p>	<p>A 100-foot corridor was selected for analysis purposes. If the land exchange is approved, then a final road corridor will be negotiated in the land exchange agreement and will likely average 100 feet wide and it would be wider in some areas and narrower in others. The final road corridor would closely follow one of the corridors analyzed in this EIS, but could vary slightly in location and width to more fully avoid impacts to sensitive resources and meet public safety requirements.</p>
	<ul style="list-style-type: none"> <li>• Rigidly confining a road to a 100-foot wide corridor greatly limits excavation depths and embankment widths. That constriction greatly limits the ability to balance cut and fill volumes and, in turn, leads to having to utilize offsite borrow pits. The preliminary engineering design that is included in this Draft EIS does conclude that there will have to be substantial offsite borrow to construct the road and that, with one limited exception, offsite borrow sources do not exist in the project area. It will greatly raise the construction costs to have to Import borrow material. This approach is at odds with standard road design practice and is believed to be totally unnecessary if one accepts the premise that roadway excavation could likely provide the majority of material needed to construct roadway embankments. Lastly, a fixed and restricted 100-foot wide corridor width can become a major impediment if the road needs to be realigned to avoid an unforeseen cultural resource site, to improve a stream crossing location or to avoid an unforeseen bad foundation condition. It also greatly constricts the construction contractors operations where large earthmoving vehicles require large turning radiuses.</li> </ul>	<p>See above response.</p>

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 03	The EIS should note that adverse impacts from road construction, maintenance, and use are well documented. These include erosion, changes to drainage patterns; fish passage concerns, noise and collision impacts to wildlife; direct destruction of plants and habitat, and indirect impacts from dust, toxic fluids and fuel; earlier snow melt from concentration of radiant heat; exhaust fumes; junk and litter; and vectors for spread of invasive plants.	Adverse effects from road construction, and operation and maintenance are discussed in the EIS. Additional text has been added that expresses these issues in Section 4.3.1.4 (Hydrology), Section 4.3.1.6 (Noise), Section 4.3.2.2 (Wetlands), Section 4.3.2.3 (Fish), Section 4.3.2.4 (Birds), and Section 4.3.2.5 (Land Mammals).
SER ROAD 04	The Tribes will commit to work with the state government in order to build the road to the highest standards. The Tribes anticipate the construction will be closely scrutinized, as is appropriate, to the quality of the land. We are building roads here as we speak. It is complicated, but we can do a pretty good job.	If the Secretary of the Interior determines the land exchange is in the public interest, the State of Alaska would be responsible for selecting a contractor.
SER ROAD 05	The Draft EIS is missing information about historic and existing roads in the project area.	The Fish and Wildlife Service has conducted several studies to objectively typify and inventory roads vs. trails vs. all-terrain vehicle tracks in otherwise remote and undeveloped areas (as referenced in the EIS.) Sections 3.3.3 (Transportation) and 3.3.10 (Wilderness) characterize trails in the area as the commenter notes, based in part on those studies. Text has been added to both sections to emphasize historic access across what is now designated wilderness and to fully characterize the nature of the aforementioned "trails" on a spectrum of all-terrain vehicle tracks to unmaintained World War II roads.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• There are "trails" through the refuge that radiate from the community of Cold Bay. Current maps show this road system as "trails", but this nomenclature was changed on Service maps shortly before the original EIS to fool the public into thinking that there were no roads there. In fact, if one zooms in on the cover of the Executive Summary, you can see a one lane gravel road crossing entirely across the photograph. These roads afford the Service and residents of Cold Bay with access to the far flung reaches of the refuge. The roads are not surrounded by "bollards" to prevent access to the surrounding land. The existence of the road system is important, because it represents an existing human intrusion on the wilderness character of the refuge,</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• A 1988 US Army Corps of Engineers report "Cold Bay in World War II Fort Randall and Russian Naval Lend-Lease," page 17, states that in King Cove, considered a part of Cold Bay, repair facilities for small craft were constructed, including a 150-ton marine railway and an adjacent machine shop. Therefore, there was a connection between the two communities long before the Wilderness Act of 1964.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Around 1963, a considerable area (what is now a complex and vibrant plant community) was mud, sand and gravel remains bulldozed during World War II activities. There was (and remains) an extensive military road system. Some of those roads extended toward Moffet Lagoon. One went 5/8 of the way across the Kinzarof Isthmus to Blinn Lake and beyond, toward the Joshua Green River. Most of this road can still be seen from the air and is well identified on old maps of the area. The presence of this existing road should be noted in the document.</li> </ul>	See above response.

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SER ROAD 06	The road does not improve the emergency response time. Under good conditions, compare a 1.5 to 2 hour car ride to a 20-minute hovercraft ride. A road in winter is no more functional than a fishing boat in high seas or an airplane in stormy weather.	The commenter is correct that the estimated travel time of the road alternatives is longer than the others, as shown in Table 4.2.3-10. The commenter is also correct that all emergency transportation options have weather constraints. The road alternatives assume that the road would be fully maintained according to weather conditions in order to provide access most of the time. Stormy sea or air conditions are a bit different, in that the only option is to wait for safe operating conditions.
SER ROAD 07	Further, anyone driving roads where there is snow removal and maintenance equipment in use, or in rural areas where there is little traffic enforcement available, knows that maintaining the integrity of a barrier is a significant challenge. Because the maintenance will not be the responsibility of the Service, it will be difficult to ensure this mitigation measure is enforced or achievable.	The Service agrees that maintaining a barrier has been a problem in some areas. The cost of maintenance of the road and barrier has been updated and is included in Sections 2.4.2 and 2.4.3. Maintenance would likely be the responsibility of the State, as owner of a potential road. Specifics would be identified in the development of the enforceable mitigation plan. Mitigation measures developed need to be achievable; Appendix F has been expanded to include responsibilities for implementing mitigation and an estimate for likelihood of successful implementation.
SER ROAD 08	Road maintenance would not be an issue; you simply need the right equipment.	The Service agrees that road maintenance is possible and that areas with southern exposure will melt snow faster. No edits have been made in response to this comment.
	<ul style="list-style-type: none"> <li>• If they can do it in Valdez, they can do it here.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Maintenance costs will be lower for the road that goes through Lenard Harbor because it has a southern exposure road. When the sun does come out, it is going to melt the snow off the road quicker.</li> </ul>	See above response.

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SER ROAD 09	Despite restriction on commercial use in the Omnibus Act, long term use of road corridor is not defined. The EIS should examine whether transfer of title to the state for the road corridor could result in commercial use of the road in the future. Explain whether there are long term restrictions on type or amount of vehicle use on the road corridor once transferred to the state.	If the land exchange is approved, the exchange agreement would identify the terms of conveyance, including restrictions on the type or amount of vehicle use on the road.
SER ROAD 10	There are so few cars in Cold Bay, the impacts from the road would be small. An example is the bridge built over a creek in the Baldy Mountain area. That bridge was incredible. It is still there. But that was carved out of the wilderness. This road could be built with very little impact on any of the fish or the wildlife.	No edits have been made in response to this comment. Analysis of effects to all resources is detailed in Chapter 4 and summarized in Chapter 2.
SER ROAD 11	Maintenance estimates of the road are too low:	Maintenance costs per mile have been updated (and increased), as shown in Sections 2.42., and 2.4.3. This is because of higher than normal snow drifting conditions in this part of Alaska, and the necessity to provide for dedicated equipment and personnel. It is still assumed that hazardous conditions could lead to occasional closure of the road, possibly a few days per year; which is not unusual in Alaska. Some economies of scale were assumed in the EIS, for coordination of maintenance of roads in the area; the assumption has been revised and upgraded to include dedicated equipment for Alternatives 2 and 3.
	<ul style="list-style-type: none"> <li>• For a comparison, it is a challenge to keep a 1.5 mile road to the dump maintained during the winter. It could not be kept open every day this year or last year.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>This document estimates keeping 30-some-odd miles open/kept-up for \$149,000. You could not keep it plowed for that. You would have 10 to have people out there 24 hours a day, literally, plowing the roads to keep them open.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>We cannot keep our roads in Cold Bay open all year due to drifting blowing snow. I think trying to keep a road between the two communities is pretty much impossible without spending a small fortune.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS Executive Summary, page 20, Table ES-2 Maintenance costs] The total costs in the table seem low. Does it include snow removal costs or the expected extra costs of vehicle maintenance and fuel given that the length of roads in the area will increase considerably for the state of Alaska? The state currently has trouble maintaining the runway and the road between Cold Bay and the Air Force facility.</li> </ul>	See above response.
SER ROAD 12	[Draft EIS Page 3-264, 3rd paragraph] A portion of Frosty Peak Road extends for miles into the Izembek Wilderness, but on a ditch-to-ditch basis, was excluded from a wilderness designation so that visitors and local Cold Bay residents could continue to use it after the official wilderness designation. This previous action by the federal government has established a precedence that should be acknowledged in the Final EIS.	Frosty Peak Road does not set a precedent for roads in wilderness areas. This road was excluded from a wilderness designation, where the proposed roads under Alternatives 2 and 3 would remove lands from the National Wilderness Preservation System that had already been designated. No text edits have been made in response to this comment.
SER ROAD 13	Please revise the Transportation section to reflect the following:	Suggested edits were made to Section 3.3, except regarding schedule delays at King Cove Airport and the years Cold Bay's dock has been frozen. This information is not available.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 3-265-266] The 5-mile road from the center of town to the King Cove Airport is known as Airport Road (not Hydroelectric Road).</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 3-265-266] There is no vehicle registration process or requirement in King Cove.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 3-265-266] The harbormaster in King Cove rented cars, but as a private business and not as part of his job as the former harbormaster.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 3-273, 1st paragraph] The referenced statement from the 2003 EIS that the road from the town of King Cove to the airport can be closed for several days in the winter because of snow is not accurate. Since the early 1980s, the city has had a fleet of snow removal equipment (i.e. graders, loaders, and dump trucks) and has always had the Airport Road travelable with 8 hours or less of all major snow storms.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Schedule delays at the King Cove Airport are not reported in the Draft EIS. The 2003 EIS notes that air service to and from the King Cove Airport was not available 55 days a year (85 percent) which is not inconsistent with the most recent schedule completion reported by PenAir as approximately 44 days a year (88 percent) in 2010. Thus, immediate access for an emergency situation is severely limited.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Cold Bay is not accessible by boat or ferry during some winters. In the old days it always froze over in Cold Bay so you could not get your boat to dock. This year it did. But for about ten years there, it did not.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 14	The reliability of the road and air travel is disputed.	The Draft EIS is in general agreement with the 2003 EIS in estimates of reliability of the road, assuming responsive maintenance. A minor difference is that the reliability estimate is not solely based on road trips for the purpose of connections to Cold Bay scheduled flights. Road trips could be for other purposes, and in either direction. Though related, the EIS does not provide an assessment of the adequacy of commercial operations or equipment. It is assumed that operations completion by scheduled air service would continue as it has historically; it is noted that the current operator, PenAir, has announced plans to transfer operations to another carrier. Facilities and conditions at the King Cove and Cold Bay Airports are described in Section 3.3.
	<ul style="list-style-type: none"> <li>A road located in either the Southern or Central Road Corridors will be available on a 24/7 basis 365 days a year. The 2003 EIS assumed an all-weather road would be available, except for up to 4 days a year. The Draft EIS assumed a road in either the Southern Road Corridor (Alternative 2) or the Central Road Corridor (Alternative 3) would have a 98 percent reliability on a 24/7 basis to meet scheduled operations, e.g. not available for a total of up to 7 days a year under either Alternative 2 or Alternative 3. Snow and storm washouts will be the reason for road closures, which is approximately the same period that the Cold Bay Airport is closed by snow and severe weather. This represents a virtually 24/7/365 solution of immediate transport 98 percent of the time.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Flying through the canyon to get to Cold Bay is pretty violent at times. But the aircraft that we are using is very old. It is used to haul freight, and they are down to one plane and one pilot in Cold Bay to handle four villages. That puts a lot of pressure on the pilots over there. We know that a Cherokee aircraft is designed for general aviation aircraft only, but they're used for commercial here. The small Cherokees can barely fly when it is blowing above 30 MPH.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• We cannot always rely on the King Cove Airport because the runway is not paved so the medical evacuation jet cannot always land here. Bad lighting at the airport prohibits planes from landing after dark.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Cold Bay has a cross wind airport so you could decide which route is best to go on with the wind. King Cove does not have a crosswind runway; it is just a straight runway.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 15	The reliability and/or viability of the hovercraft is questioned, therefore the Draft EIS should be revised to reflect the following:	Data about the historical operations of the hovercraft is presented in Section 3.3.3 (Transportation), and the purpose and need for considering 5 alternatives in this EIS is described in Chapter 1. The commenter is correct about estimated days of unavailability of the hovercraft. Mitigation measure B.i. under Fish and Wildlife Protection Plan in Appendix F states: No vessel will travel north of a straight line between the Northeast Terminal and Cross Wind Cove terminals, except in the case of a life threatening emergency. Travel for all non-emergency purposes could continue as usual. Alternative 1 was revised due to the Aleutians East Borough's decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation. Alternative 4 remains as an alternative. References to the hovercraft as Alternative 1 have been deleted throughout. Plans for the Aleutians East Borough to resume operations from King Cove to Cold Bay have been deleted throughout, in accord with the Aleutians East Borough's statements regarding future operations. The picture of the Suna-X remains as a representative craft, as a hovercraft remains as Alternative 4.
	<ul style="list-style-type: none"> <li>Overall, the reliability of the past hovercraft operation in Cold Bay is essentially no better than the reliability of existing transportation. We cannot rely on the hovercraft here because of the weather, the lack of parts, and the city's inability to pay for maintenance.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The proposed operation of 1 round trip on a 6 day a week schedule for the hovercraft under Alternative 4 means scheduled hovercraft service is not available for 52 days a year regardless of sea conditions. The Service has assumed</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	the hovercraft will have a 70 percent reliability to meet scheduled operations, e.g. not available for an additional 94 schedule-days due to sea conditions or maintenance/crew availability for a total unavailability of the hovercraft to provide service to meet scheduled air service at the Cold Bay Airport for a total of up to 146 days a year.	
	<ul style="list-style-type: none"> <li>Existing authorizations for hovercraft operations between the northeast corner of Cold Bay [Northeast Terminal] and Cross Wind Cove provide an exemption for "life-threatening medical emergencies" that will be available even when inside the No Transit Zone established to prevent adverse impact to wildlife species (see Mitigation Measure 5.B.i). Urgent medical referrals or scheduled or long-lead medical appointments or other urgent travel requirements do not qualify for this Corps/Service approved exemption.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The proposal of having a hovercraft used as a ferry is not feasible. In this part of the Alaska Peninsula there are high sustained winds in the winter and ice. The hovercraft would only work during those times that a small plane could fly across, anyway. As for a ferry, it would take one the size of the Aurora to be of use in the winter because of the high winds and seas. This would not be cost effective.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The hovercraft only worked until the weather got to thirty to forty knot winds. Then it was grounded.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS Page 3-270] The section must be rewritten to reflect permanent suspension of Hovercraft operations.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 332] Delete the picture of hovercraft; this is misleading the public that the vessel is still a viable option.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 4-10, 4-11] Delete reference to the Aleutians East Borough hovercraft resuming operation.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS Page 4- 13] Delete reference to the hovercraft on the bullet list at top of the page.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Delete Hovercraft 590 tons per year on Table 4.2.1-2.</li> </ul>	See above response.
SER ROAD 16	There is a dispute about some facts regarding the ferry system. In some cases, more details are needed.	Overall reliability for all modes is estimated based on operations at any time, in any direction. The effectiveness of each travel mode to meet scheduled flights at Cold Bay Airport is further described in Section 3.3.2 (Transportation). Reliability of a ferry to operate was derived from interviews of ferry operators elsewhere. The EIS does not identify the potential operator of a ferry, and it is agreed that costs could vary with a potential operator. Text has been added to Section 3.3.2 and referenced in Chapter 4 to clarify the above. Days in dry-dock for inspections has been increased in response to this comment, and maintenance costs have also been increased.
	<ul style="list-style-type: none"> <li>• [Draft EIS Chapter 2 Alternative 5] There is no mention of who will operate the displacement hull ferry. There is no intent for the Alaska Marine Highway System to operate this ferry. However, depending on who would operate the ferry, the costs would be significantly different (i.e. union versus non-union, government verses private, etc.)</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS 2-47] The assumption that the ferry will be out of service for seven days every two years is unrealistic. The estimate needs to assume transit time to a dry-dock of adequate size to accommodate the ferry.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS Alternative 5 2.4.5] The Final EIS should give some indication of the ferry schedule and how it would align with flight schedules into the Cold Bay Airport. The Final EIS should evaluate whether multiple trips per day between Lenard Harbor and Cold Bay during peak travel periods is practicable. The public expectation could quickly become an expectation that the ferry will meet and serve all flights.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The ferry will not be available for 52 days a year due to the 6-day a week schedule. Winds at the Cold Bay Airport have recorded gusts exceeding 70 knots sometime during the months of November and January with the other months exceeding 50 knots add an additional but unidentified period when a ferry could not safely use the Lenard Harbor ferry terminal or the modified Cold Bay Dock which extends more than 2,000 feet into the unprotected waters of Cold Bay to winds from the Bering Sea or from the North Pacific Ocean. Road closures due to snow or storm washouts will account for up to 2 days a year. The Draft EIS assumed the ferry will have a 99 percent reliability to meet scheduled operations, e.g. not available for an additional 3 schedule-days due to sea conditions or maintenance/crew availability for a total unavailability of the ferry to provide service to meet scheduled air service at the Cold Bay Airport for a total of up to 55 days a year. A ferry will have also have a minimum of two 7-days a year out-of-service for U.S. Coast Guard mandatory dry-dock inspection of a passenger carrying vessel every 2 years.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>We cannot always rely on sea transportation because of weather. There is a bad dock in Cold Bay. The ferry is not reliable because it is not year-round. When the weather is bad, it would not be good ride.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>The Lenard Harbor ferry alternative is not feasible because Cold Bay Dock and Lenard Harbor ice up during the winter.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 17	The following tables should be analyzed for inclusion in the alternatives analysis and transportation sections:	The provided tables summarize information in a condensed format as modeled for the 2003 EIS. While the current EIS provides similar information, it is formatted to be consistent from the present study. The text in Section 3.3.3 has been revised to define "reliability." The term is used in a different context in the above referenced tables than it is in the Final EIS. Comparisons with 2003 EIS data are useful background data, and have been used in the development of the Final EIS.
	<ul style="list-style-type: none"> <li>• Table 5. Summary of the King Cove Group Conclusions on the Reliability of Transportation between the City of King Cove and the Cold Bay Airport under the No Action Alternative.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Table 6. Summary of the King Cove Group Conclusions on the Reliability of Road Transportation between the City of King Cove and the Cold Bay Airport under Alternatives 2 and Alternative 3.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Table 7. Summary of the King Cove Group Conclusions on the Reliability of Hovercraft Transportation between the Northeast Corner of Cold Bay [Northeast Terminal] and Cross Wind Cove under Alternative 4.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Table 8. Summary of the King Cove Group Conclusions on the Reliability of Ferry Transportation between the Lenard Harbor and a Modified Cold Bay Dock under Alternative 5.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Table 9. King Cove Group Overall Conclusions on the Reliability of each Alternative to Provide Transportation between the City of King Cove and the Cold Bay Airport for Emergency Medical Evacuation and for Other Travelers to Connect to Scheduled Air Service from the Cold Bay Airport.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Table 10. Comparison of the Ability of each Alternative to Provide Cost Effective Transportation between the City of King Cove and the Cold Bay Airport in the 2003 EIS and this Draft EIS. [See pages 21 - 25 in the King Cove Group Consolidated Comments]</li> </ul>	See above response.
SER ROAD 18	The road design described in the Draft EIS is not adequate to allow for road construction, operation, and maintenance.	<p>The 35 percent design work, discussed in Section 2.4.2, is the basis for the road analyses, and is a standard practice in NEPA analyses. The design work included site visits to establish local conditions to that level of analysis. More surface data will be required prior to final design, if the land exchange is approved.</p> <p>No edits have been made to engineering criteria in the EIS. However, this could be refined at a later date as post-EIS engineering could ensue, if the land exchange is approved.</p>
	<ul style="list-style-type: none"> <li>The final design of a road located in either the southern road corridor or the central road corridor should incorporate a balancing of cuts and fills. The profiles shown in Draft EIS Appendix E do not. Setting a profile that allows for cut and fills to balance is a standard road engineering practice.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS 2-29 Typical section] Typical structural section is not sufficient for building a road over virgin terrain with soft soils, drainage structures, and possible permafrost. Minimum 5-foot embankment.</li> </ul>	Based on the engineering site visits, the majority of subsurface is firm granular material, and minimum 3-foot embankment should be sufficient for the majority of the road. Geotextile would be placed on top of vegetation in soft soil areas of the project if the land exchange is approved.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-29 Typical section] 1.5:1 side slopes is really steep and will likely result erosion and instabilities within the road. Flatten slopes to a minimum of 3:1.</li> </ul>	The steeper 1.5:1 side slopes are consistent with the King Cove Access project and are preferred in the refuge area to help retain vehicles on the road. Road final slope requirements will be finalized in final design for construction, if the land exchange is approved.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-29 Typical section] 6 inches of surface course should be increased to ensure stability. Surface course should be increased to ensure long-term stability within the structural section.</li> </ul>	Final thickness of base course can be determined in final design for construction, if the land exchange is approved.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-29] Recommend at least 9 inch E-1 base course. Ditch depths need to be at least 2-feet; this includes the 1-foot riprap ditch lining.</li> </ul>	Ditches are currently designed with ditch depths 2-feet or greater.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-28] 900-foot separation between turnouts is excessive especially during conditions of low light and poor visibility. Recommend turnouts be located every 500 feet, except in those location where terrain or environmental factors dictate a longer distance.</li> </ul>	Turnouts are generally spaced closer than 900 feet due to visibility constraints. Final turnout locations can be addressed in final design for construction if the land exchange is approved.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-29 Typical section] The combination of wind, water and snow will be a major issue in determining the roadside ditch design. The shallow V-ditch proposed will be problematic. A minimum four-foot flat bottom ditch would be more appropriate for these conditions.</li> </ul>	The 3-foot V-ditch is the standard dimension for road ditches in Alaska and should be more than adequate to handle the runoff in this area.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• [Draft EIS 2-28] Substantial drainage structures will be required on this project. Minimum, 24-inch culverts would result in only 1-foot of coverage. This will likely result in differential settlement and "speed bumps." Recommend the structure section be increased.</li> </ul>	<p>Cross culverts should not cause differential settlement speed bumps. A 1-foot cover conforms to Alaska Department of Transportation and Public Facilities' minimum cover requirements for 24 inch culverts and should be sufficient. Most cross culverts would be located at low points and would likely have much greater than 1-foot of cover, if the land exchange is approved.</p>
	<ul style="list-style-type: none"> <li>• Recommend a minimum four-foot flat bottom ditch. At a minimum the depth of the roadside ditches should be increased.</li> </ul>	<p>The 3-foot V-ditch is standard dimension for road ditches in Alaska and should be more than adequate to handle the runoff in this area.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS 2-27 &amp; 2-36 Design] The proposed roadway (width &amp; height) should allow for adequate cover for minimum culvert size of 24 inches all culverts.</li> </ul>	<p>A 1-foot cover conforms to Alaska Department of Transportation and Public Facilities' minimum cover requirements for 24 inch culverts and should be sufficient. Most cross culverts would be located at low points and would likely have much greater than 1-foot of cover, if the land exchange is approved.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS 2-29 2.4.2 Cross section] There are two issues with the 1.5:1 slope: - To assume a 1.5:1 is a steep slope in a preliminary cross section before a geotechnical study is performed. Except in area of rock, it will be very difficult to prevent erosion both during construction and operations. The 4:1 recoverable slope does not extend far enough from the travelled way. The American Association of State Highway and Transportation Officials suggests 7-foot to 10-foot as the middle of the range.</li> </ul>	<p>The steeper 1.5:1 side slopes are consistent with the King Cove Access project and are preferred in the Izembek National Wildlife Refuge area to help retain vehicles on the road. Road final slope requirements will be determined in final design for construction, if the land exchange is approved. The 13-foot road width assumes a 9-foot travel way and 2-foot shoulders on each side. The 2-foot shoulders and 5-foot of 4:1 recoverable slope provide the 7-foot minimum clear zone.</p>
	<ul style="list-style-type: none"> <li>• [Draft EIS 2-38 2.4.3 Design Criteria, p3] Although the American Association of State Highway and Transportation Officials low volume road guidelines allow for grades up to 12 percent. This is not advisable for either road alternative with the winter weather conditions across the isthmus.</li> </ul>	<p>Grades were kept to a minimum where possible. Final profile grades can be determined based on more accurate surface data in final design for construction, if the land exchange is approved.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>If you get the road above the terrain, you would avoid the drifting problem; snow would blow over the top of it for the most part.</li> </ul>	The road was kept above the terrain where possible in fill areas to avoid drifting problems, 6:1 cut slopes were recommended in cut areas to avoid drifting problems.
	<ul style="list-style-type: none"> <li>With up to 158 pull-outs, a person might as well build the road with 2 lanes.</li> </ul>	The linear dimension total of all 158 pullouts is 12 to 13 percent of the entire road length, or equal to approximately 2.5 miles out of 20 miles total road length.
SER ROAD 19	The final road design (of either the southern road or the central road corridor) should consider snow fences to reduce the wider footprint created with the proposed 6:1 cut slopes.	Snow fences were considered but they would have to be placed over 100 feet from the top of the cut slopes to be effective and would be outside the corridor, and were therefore dismissed due to the corridor constraints.
SER ROAD 20	Placement of the bollard/chain barrier system not further than 10 feet from the edge of the road footprint does not provide for equipment operation necessary road maintenance of side slopes or drainage appurtenances. The bollard/chain barrier system on both sides of the road should be placed on the property boundary between the state and federal ownership because the boundary is the minimum amount of land needed to construct, operate, and maintain a road that meets the purpose & need.	For analysis of this EIS, the typical section shows the barrier 10 feet outside toe of fill slope or ditch. Moving the barrier to the exchange parcel boundary could compromise resources between the barrier and the road. Final location of barrier would be determined in final design, if the land exchange is approved.

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 21	Draft EIS Table 2.4-2 indicates the maximum width of the road foot print under Alternative 2 will be 91 feet; 92 feet under Alternative 3 adding a minimum of 10 feet for a bollard/chain barrier system. This maximum width of 100 feet, established by the Service, is an arbitrary and capricious. An arbitrary and uniform width will not meet the requirement of Subtitle E for either transferring the minimum acreage to the state or the requirement that the land transferred be adequate for construction, operation, and maintenance. The service should include either a conceptual footprint of the road alignments (to determine the likely widths of the land that will be transferred to the state for construction, operation, and maintenance) or change the description of the road corridors to be "an average of 100 feet in width."	Text has been added to the end of the second paragraph in section 2.4.2 and 2.4.3 to indicate a 100-foot corridor was selected for analysis purposes. If the land exchange is approved, then a final road corridor will be negotiated in the land exchange agreement and will likely average 100 feet wide by being wider in some areas and narrower in others. The final road corridor would closely follow one of the corridors analyzed in this EIS, but could vary slightly in location and width to more fully avoid impacts to sensitive resources and meet public safety requirements.
SER ROAD 22	The number of passengers estimated to ride the hovercraft is 1,500 for Alternatives 4 & 5, but 1,000 for Alternative 1. Why?	Alternative 1 is the No Action alternative, which analyzes the existing condition. Alternative 1 was revised to reflect the Aleutians East Borough's decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation. The prior service estimate for Alternative 1 in the Draft EIS was lower than for Alternatives 4 and 5 because Alternative 1 assumed seasonal service and fewer days of operation per week, because that is how the hovercraft last operated. Alternatives 4 & 5 show year-round service and a 6-day per week schedule, so there would be more passengers.
SER ROAD 23	The description for Visual Flight Rules at King Cove Airport seems correct and is more detailed than in the executive summary and Chapter 1 or 2. This should be substituted in those places. [Draft EIS Page 3-267]	This level of detail is appropriate for Section 3.3.3 (Transportation). The Executive Summary and Chapters 1-2 are broader overviews. No revisions were made in response to this comment.

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 24	[Draft EIS p. 2-33 2.4.2 Operations and Maintenance] Is the stockpile quantity important? The presumption that 10,000 cubic yards will be stockpiled during the construction phase. This would be contingent on several factors such as the funding, area for stockpile, storm water runoff concerns and wind erosion concerns. Recommend that this reference be deleted.	Stockpiles are described in Sections 2.4.2 and 2.4.3. Within a 35 percent engineering analysis standard for NEPA evaluations, the discussions of stockpiles is descriptive, but not essential to the current analysis. Future engineering could further detail the area, runoff, and erosion concerns, if the land exchange is approved.
SER ROAD 25	[Draft EIS Page 4- 15] Delete 127 cars and revise to appropriate number equivalency based on ferry only.	Alternative 1 has been revised due to the Aleutians East Borough’s decision to cease hovercraft operations. The alternative reflects the best understanding of the existing situation. The impact analyses were also revised.
SER ROAD 26	Who is going to enforce the non-commercial use of the road? Who is going to enforce and prevent off-road use from the road? The Service should consider that once the road is built it may be used for purposes other than what were originally considered a need and access would become too relaxed.	As described in the EIS, the ability to enforce regulations is one of the major concerns of the Service. It is not likely that the King Cove Corporation could provide law enforcement due to state and federal laws regarding the provision of law enforcement services. The King Cove Corporation and/or other local institutions may be able to assist in providing mitigation services. As responsibility for implementing most mitigation would fall to the State of Alaska as the landowner of the road corridor, it would be up to the State of Alaska to determine the most cost effective means of implementing mitigation measures identified in the enforceable mitigation plan, if the land exchange is approved.

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 27	Details about the material and disposal sites and materials sources are inadequate.	<p>Within a 35 percent engineering analysis standard for NEPA evaluations, the discussions of materials are descriptive. The following is based on an engineering inspection that elicited the following information.</p> <p>Text has been added to the last bullet of ‘Components’ in section 2.4.2 and 2.4.3, indicating it is likely that additional gravel sites could be developed to the north of the existing gravel pit site near the Northeast Terminal, based on observations of road cut banks and probing efforts during the site visit. Existence of suitable gravel quality and quantities at these sites would have to be verified by a geotechnical investigation prior to final design for construction, if the land exchange is approved.</p> <p>These sites are on King Cove Corporation lands, within the boundary of the Refuge, and the subsurface is owned by the federal government. Therefore, gravel is owned by the federal government and its removal is subject to ANCSA Section 22(g). Proposals to develop the gravel resources would be subject to a Compatibility Determination by the Izembek National Wildlife Refuge and would require a special use permit.</p> <p>Text has been added to the second paragraph of ‘Construction’ in sections 2.4.2 and 2.4.3 indicating unusable materials (organics and ash) are very thin on hilltops and ridges, and in some places non-existent. Unusable material would not be generated in low areas where road fill and geotextile fabric would be placed directly over the organic mat.</p> <p>Side borrow production was considered but would require expanding the construction footprint beyond the minimum footprint required to construct the road, and was therefore dismissed.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• [Draft EIS 2-31] Only one material site has been identified for use. This is unrealistic given the length and volume of material required for this project</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS 2-31] No information was presented on the type and quantity of material available at this site. Upon completion of the current construction project to the Northeast Hovercraft Terminal [Northeast Terminal] site, most useable material will be exhausted. The Final EIS will need to take into consideration disposal of unusable material. The rolling terrain of the central alignment (Alternative 3) would likely generate large quantities of unusable material associated deeper excavation and the likelihood of encountering volcanic ash. The amount of material cannot be quantified without a detailed geotechnical investigation. If this material cannot be disposed within the road corridor, off-site disposal would be a significant cost.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS 2-31] 6.2 acres is too small for the volume of material required on this project. A material site(s) in excess of 20 acres could be needed to provide the embankment fill necessary for the road. Surface course material would likely have to be barged to the project.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• [Draft EIS 2-31] No material disposal sites were identified. Is it assumed that all organic material will be place on slopes? It is likely there will be a substantial amount of overburden to deal with. If placed on slopes, the result in even shallower ditches.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• There is little discussion in the Draft EIS regarding the disposal of unusable excavated material. Draft EIS Table 2.4-2 shows 0.3 and 2.4 acres of uplands reclaimed with excavated material in Alternatives 2 and 3 respectively. It is likely that both Alternatives 2 and 3 would generate a large volume of unusable material since much of the area could have a thick layer of organics and/or volcanic ash at or near the surface. It is also possible that because of the local climate, excavated material would be too wet to compact and that drying the material would not be feasible. Therefore, the Final EIS should have an expanded discussion of construction sequencing and methodology for each alternative. This should include an analysis of the roadbed width necessary for construction traffic.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Material sources (especially side borrow production) should be discussed.</li> </ul>	See above response.
SER ROAD 28	[Draft EIS Chapter 4, Page 4-158, Sec. 4.3.2.5, Paragraph 4] Change sentence to reflect the fact that two types of barriers are being considered, only one of which involves a chain barrier. The Draft EIS states, "However, if off-road vehicle access from the road is not effectively limited by the chain barrier, then human impacts can spread to a much greater area." Suggested replacement text: "However, if off-road vehicle access from the road is not effectively limited by the barrier, then human impacts can spread to a much greater area without additional management and enforcement of existing off-road vehicle regulations."	Section 4.3.2.5 has been corrected to: "However, if off-road vehicle access from the road is not effectively limited by a barrier, then human impacts can spread to a much greater area."

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 29	<p>Alternatives 2 and 3 General Comment. Without either a detailed description of the engineering analysis or a design report as an appendix, reviewers are not able to understand the design factors and engineering thought process that went into establishing the centerline location and other design elements. This is critical information that is necessary in determining the best road location and establishing the minimum corridor width necessary for a road that meets State of Alaska design standards, as directed in the Act.</p>	<p>Within a 35 percent engineering analysis standard for NEPA evaluations, the discussions of parameters is descriptive. The following is based on an engineering inspection that elicited the following information. This could be updated with engineering subsequent to the EIS, if the land exchange is approved.</p> <p>Alignments were first established by the Service and Alaska Department of Fish &amp; Game as lines on an aerial photograph. Engineers then translated the hand drawn lines into AutoCAD Civil 3D drawings. The alignments were best fit on with USGS topographic maps and aerial photographs referenced into the drawings. The alignments also were adjusted to avoid what appeared to be wetlands on the aerial photos, particularly on the east portions of the alignments. The engineering site visits provided an opportunity to adjust the alignments to follow the most favorable terrain and avoid wetlands. The adjusted alignments were traced with GPS equipment. The alignment on the western end followed the existing Outpost Road alignment. Factors considered for location of the alignments included profile gradient and steepness of side slopes. Steep side slopes were avoided, the road was aligned away from the base of steep hills where possible, to avoid snow drift zones. No text edits have been made in the EIS in response to this comment.</p>

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 30	<p>Alternative 2 and 3 General Comment. The ability for construction trucks to safely pass without stopping will be constructability issue that affects both the duration and cost while building the subgrade and placement of surfacing material. The contractor could not use large capacity construction vehicles that haul 20 cubic yard loads because they could not pass safely on the proposed subgrade width. The ability to use large capacity haul equipment would provide efficiency, economy of scale and reduce construction time. The use of standard highway end dumps with trailers or longer belly dumps can deliver equivalent loads to the articulated trucks but would be impracticable because of restricted turnaround and backing-up constraints. Common off road trucks have an operating width of approximately 12 feet. The proposed finished subgrade surface is 21 feet, which would not be adequate for larger haul vehicles to pass safely. Recommend an increase in subgrade width of two to three feet, which would enable these larger off road trucks to pass safely. This would increase the increase the foot print slightly but would reduce construction time and disturbance to wildlife.</p>	<p>Within a 35 percent engineering analysis standard for NEPA evaluations, the discussion is descriptive. The description is based on an engineering inspection. The design could be updated with engineering subsequent to the EIS, if the land exchange is approved.</p> <p>Text has been added to the end of the second paragraph of ‘Construction’ in sections 2.4.2 and 2.4.3, indicating large capacity construction vehicles that haul up to 20 cubic yard loads would likely be used on the project due to the large quantities of earth to be moved. These vehicles require a 12-foot wide operating width; the proposed final subgrade as currently designed would be approximately 24 feet wide. An efficient operation could necessitate construction of additional temporary widened areas between the permanent turnouts to allow for safe passing.</p>
SER ROAD 31	<p>[Draft EIS 2-28 Design Criteria] American Association of State Highway Officials low volume local roads guide suggests that the design speed should realistically represent actual and anticipated operating speeds. A 20 miles per hour design speed may not be too slow for this road given several factors such a sight distance, terrain and low traffic volumes. Suggest that the design speed of the Outer Marker and/or Outpost Road be used.</p>	<p>20 mph should be an appropriate safe operating speed for a 13-foot wide one lane road. Outer Marker road geometrics, with full two lane road width, do not compare directly with the single lane road operation, so design speeds are not similar. Outpost road is a jeep trail, with no consistent geometry in which to extrapolate a specific design speed.</p>

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 32	The Service is requested to clarify the review process for the Secretary of the Interior's Public Interest Determination:	<p>For the land exchange to be approved, the Secretary of the Interior must find it in the public interest after this EIS is completed.</p> <p>The relationship between the 35 percent engineering estimate and final design for construction has been clarified in Chapters 1 and 2. Variations to the 100-foot corridor could occur as a result of further physical studies, and Chapter 2 has been revised to make that clear.</p> <p>Text has been added to the end of the second paragraph in section 2.4.2 and 2.4.3 to indicate a 100-foot corridor was selected for analysis purposes. If the land exchange is approved, then a final road corridor will be negotiated in the land exchange agreement and will likely average 100 feet wide by being wider in some areas and narrower in others. The final road corridor would closely follow one of the corridors analyzed in this EIS, but could vary slightly in location and width to more fully avoid impacts to sensitive resources and meet public safety requirements.</p>
	<ul style="list-style-type: none"> <li>The EIS should explain what the Secretary of the Interior's review will take into consideration and how it compares to the well-defined Compatibility Determination process. The Final EIS should clearly define how the Public Interest Determination will be conducted. The failure to define the Public Interest Determination process undermines the integrity of the current NEPA process.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>The Draft EIS also says that "should the Secretary determine that the proposed land exchange and the proposed road is in the public interest, then the alignment and design of the road would be refined ... " (Draft EIS p 1-11 ). The Final EIS needs to clearly explain this process of refinement [Draft EIS Chapter 1, Page 1-11, Sec. 1.5, Paragraph 1].</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS Chapter 2, Page 2-4, Sec. 2.4.3, Paragraph 2, Alternative 3] Final project design and construction details may be different. Elaborate on this: what restrictions will there be between the information provided in the Final EIS/Record of Decision and the actual land exchange corridor and mitigation plan?</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>While we believe that Alternatives 2 and 3 have been developed in sufficient engineering detail to compare the design characteristics, environmental impacts and costs, we do not believe there is enough detail provided by the 35 percent design to determine the minimum corridor width necessary to construct and operate a single lane two-way gravel road. We remain concerned that the 100-foot corridor width proposed by the Service will not be adequate for the entire corridor. The plans sheets in Appendix E (Water Sources and 35 Percent Road Design) have multiple locations where embankment fills and cuts extend near the 100-foot right-of-way limits. It is difficult to discern cut slope angle at these locations, but if steeper slopes are being used to stay within the 100-foot corridor as indicated in previous plans (e.g. 2:1 cut slopes) there could be slope stability problems. The Service should revisit this issue and begin a dialog with the state real estate staff to resolve the issue of conveying title for a corridor, which will support the construction of a road that meets state design standards, as directed in the Act.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS P-P Sheet] Larger horizontal and vertical curves will likely catch outside the 100-foot corridor in some locations. Either widen the entire corridor or identify those areas where the road embankment would exceed 100 feet.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-23 Table 2.4-2] Should address temporary construction impacts, which will likely result in wider corridor in mountainous areas.</li> </ul>	See above response.
SER ROAD 33	No soils or geotechnical investigations were conducted as part of this engineering. This should be a major concern for the stakeholders, given the restrictive nature of the narrow corridor, steep grade and slopes, major horizontal curves, drainage structures (culverts and bridges), water bodies and soft erodible soils.	Geotechnical investigation would be needed to finalize cut and fill balance as stated in Chapter 2 of the EIS. Probing during field investigation revealed overburden thickness of 0 inches to a few inches thick typical on hilltops and ridges, and 1 foot thick most other areas away from the hilltops and ridges. A good portion of the areas away from hill tops and ridges would be in fill sections, where geotextile fabric would be placed directly over the 1 foot thick organic mat. Areas in between hilltops and fills in low areas would generate unusable material. More accurate quantities of unusable materials cannot be determined without additional ground surface data.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-28] Recommend a field investigation along both road corridors with soil probes as necessary to assist in the preliminary engineering analysis.</li> </ul>	A 100-foot corridor was selected for analysis purposes. If the land exchange is approved, then a final road corridor will be negotiated in the land exchange agreement and will likely average 100 feet wide by being wider in some areas and narrower in others. The final road corridor would closely follow one of the corridors analyzed in this EIS, but could vary slightly in location and width to more fully avoid impacts to sensitive resources and meet public safety requirements. Additional engineering work, including surveying and design would need to be conducted if a road alternative is selected.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS 2-28] It states that the "cut and fills have balanced". With no geotechnical information available, how was the overburden thickness addressed? We encourage the Service to conduct a reconnaissance level field investigation of the two alignments.</li> </ul>	See above response.
SER ROAD 34	[Draft EIS 1-3 sec. 1.2 last paragraph page 1-3, last sentence] Sentence reads "Upon issuance of a construction permit." Is this referring to a specific construction permit? If so I would mention which permit is being referenced.	Additional language has been added clarifying that the Act did not specify the meaning of the term, but that it may reasonably be taken to refer to the Corps' 404 permit.
SER ROAD 35	There are problems associated with bollards or any barrier type used along the road.	<p>The barrier is a specific requirement of the Act and must be included as part of the analysis of the road alternatives. For analysis of this EIS, the typical section shows the barrier 10 feet outside toe of fill slope or ditch. This location should not interfere with snow clearing, and distance away from and below the road will help mitigate snow drifting that develops around the posts. Subsurface soils along the corridor are generally firm, problems due to jacking and soft soils should not be a problem in general. There would be some maintenance required to maintain the barrier. Final location of barrier would be determined during final design if the land exchange is approved.</p> <p>The Service acknowledges challenges with the maintenance of the bollards, and that it would increase maintenance costs. Maintenance costs have been updated in Sections 2.4.2 and 2.4.3. Signage along road corridors through the Izembek National Refuge is within the Service's area of responsibility. Snow drifting has been considered in the maintenance estimates.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Barriers of any type along roadway could significantly increase long-term maintenance costs.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-26] Installation of typical bollards as shown may not work due to soft soils and frost jacking. As a result, the bollards and chain may not keep all-terrain vehicles out of the wilderness. Consider other solutions such as periodic signage and only use bollards where refuge staff feels it absolutely critical.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>[Draft EIS 2-27] Recommend installing signs along roadway and installing the barrier at locations deemed to be problematic.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>If you are going to put something on the side of the road, you are going to cause drifting problems. For every one foot of rise, you get three foot of drift. If the road is intended to be used for safety and you are causing a drifting problem, it is an issue. There should not be stipulations for barriers or anything.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>How would snowplows get around the cable barrier?</li> </ul>	See above response.
SER ROAD 36	[Draft EIS 2-32] The Draft EIS describes 0.5 acres of land for a temporary barge landing. This is very small considering the type of equipment and resources that are involved in project of this size. They should be 2 acres minimum or clarify assumptions.	Text has been added to the last bullet in ‘Components’ in sections 2.4.2 and 2.4.3, indicating barge landings would have an area of 0.5 acres, with a larger staging area located on adjacent uplands, at the Northeast Terminal and Cold Bay.

SOC Code	Statement of Concern (SOC)	Response
SER ROAD 37	[Draft EIS 2-32] It is unlikely that staff housing would be located in King Cove. The contractor would likely establish a remote camp in the vicinity of the Northeast Corner Hovercraft Terminal [Northeast Terminal] site or adjacent King Cove Corporation lands. Contractors routinely establish field camps when working in rural Alaska.	The anticipated size of workforce (approximately 30 people) would not necessarily require a construction camp. Part of the 30-person staff would be local residents. Workforce is discussed further in the Chapter 4 Socioeconomic sections.

## Socioeconomic Resources - Subsistence (SER SUB)

SOC Code	Statement of Concern (SOC)	Response
SER SUB	Comments on impacts to subsistence resources and subsistence activities.	Category Code; no response required.
SER SUB 01	The Draft EIS does not adequately analyze how the proposed road could impact subsistence resources and use and should be revised:	See response to each of the sub-components of this statement of concern.
	<ul style="list-style-type: none"> <li>The existing data reviewed and utilized in the Draft EIS is outdated, and harvest survey and resource mapping for some communities require additional analysis for inclusion in the Draft EIS.</li> </ul>	The State of Alaska confirmed that all major existing subsistence use data sources were incorporated into the EIS. Based on a suggestion from the State of Alaska regarding these comments, additional subsistence data and ethnographic context for False Pass and Nelson Lagoon were incorporated into the Final EIS from unpublished on-going research by Dr. Katherine Reedy-Maschner.
	<ul style="list-style-type: none"> <li>The potential negative impact of increases in sport hunting on waterfowl subsistence species that are important to the people of western Alaska (beyond the Izembek area to the Yukon-Kuskokwim Delta) has not been sufficiently analyzed in the Draft EIS.</li> </ul>	Several comments under this heading suggest that the some alternatives might increase the level of sport hunting (waterfowl or caribou) or fishing the vicinity of Cold Bay to such an extent as to affect population abundance resulting in reduced success by subsistence waterfowl hunters in the Yukon Kuskokwim Delta and by local subsistence users on the Izembek National Wildlife Refuge. The sport waterfowl and caribou harvests, as well as the sport fishing in the region, are actively managed by seasons and bag limits, with seasonal enforcement to ensure compliance. It is highly unlikely that any increase in sport hunter access would be so great as to result in a breakdown of this conservation management program.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Proposed limits on areas open to sport hunting and/or sport fishing in the refuge have not been adequately analyzed in response to increased levels of access created from the road. Road access could increase illegal take from the Southern Alaska Peninsula Caribou Herd, an important subsistence resource shared by several communities. There are increased hunting pressures that come with construction of roads.</li> </ul>	<p>See above response.</p>
	<ul style="list-style-type: none"> <li>The Final EIS should address the effect of the land exchange on the management goal of having a caribou population in the area that supports a sustainable harvest for both sport and subsistence purposes.</li> </ul>	<p>The land exchange would affect land status, but not the overall management goals and objectives for fish and wildlife resources. The Alaska Department of fish and Game and the Izembek National Wildlife Refuge would continue to manage wildlife resources for healthy and sustainable populations.</p>
	<ul style="list-style-type: none"> <li>The Final EIS should describe the total expected harvest of fish and wildlife species in order to give context to any increased harvest of fish and wildlife and subsistence resources as a direct result of Alternative 2 or 3.</li> </ul>	<p>Section 3.3.7 summarizes existing data on contemporary subsistence harvest levels by the affected communities. As shown in Section 4.3.3.7 for Alternative 2 and Section 4.4.3.7 for Alternative 3, very minor impacts on existing subsistence harvests are expected with changes in transportation access.</p>
	<ul style="list-style-type: none"> <li>The Final EIS should clarify at Chapter 2, [Draft EIS Page 2-72] Subsistence, Overall Effects. While likely just a semantics concern, the land exchange would not place an additional 50,737 acres under “federal subsistence management.” Rather, an additional 50,737 acres of land would be federal, and therefore open to federal subsistence users. The State of Alaska retains primary management authority for all fish and wildlife throughout Alaska, unless preempted by federal law, regardless of land ownership.</li> </ul>	<p>The Service agrees that the federal subsistence management program would apply to those parcels entering federal management. This clarification has been added to the Final EIS.</p>

SOC Code	Statement of Concern (SOC)	Response
SER SUB 02	Potential loss of subsistence harvest opportunity due to the road will negatively impact the quality of life for King Cove residents, and has not been adequately analyzed in the Draft EIS.	Sections 4.3.3.7 and 4.4.3.7 analyze the potential impacts of Alternative 2 and 3 on subsistence harvest opportunities. Both impact assessments found the direct and indirect effects from construction and operation of the road alternatives on subsistence resources would be considered negligible to minor. The Service has concluded that the subsistence harvest analysis was adequate so no change was made.
SER SUB 03	The effects of more public land available to any potential subsistence user, rather than restricted only to King Cove Corporation shareholders and invitees, should be revised to be major (beneficial) [Draft EIS p. 2-72] Additional items related to the land exchange and subsistence for consideration in the impact analysis of the Final EIS include:	Comments generally requested additional analysis of impacts associated with the land parcels to be added to federal subsistence management under the conditions of the land exchanges. The Service agreed and additional revisions have been made to Sections 4.3.3.7 and 4.4.3.7 to evaluate the impact of additional lands added to federal subsistence management, which are available to qualified local residents for the harvest of subsistence resources.
	<ul style="list-style-type: none"> <li>• The land ownership changes identified in Alternatives 2 and 3 result in federal management for access to, and use of, subsistence resources on 56,200 acres. Federal ownerships are required to give priority to qualified local residents for use of subsistence resources when there is insufficient resource to meet demands for commercial, sport, and subsistence harvest. This needs to be factored in to the analysis of impacts to subsistence resources in the EIS.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>• Subtitle E requires the 4,282 acres of water and submerged lands comprising Izembek Lagoon to be added to the Izembek State Game Refuge, which will be highly beneficial to the long-term management of subsistence fish and wildlife resources because Kinzarof Lagoon will be managed in the same manner as the resources in the Izembek Lagoon complex.</li> </ul>	<p>The addition of the Kinzarof Lagoon to the Izembek State Game Refuge would provide greater protection for tidelands and submerged lands, including eelgrass beds, and marine water that provide habitat for Steller’s eiders, emperor geese and other waterbirds; harbor seals; and various species of fish. The Alaska Department of Fish and Game would use the Izembek State Game Refuge Management Plan to manage land use activities in the lagoon, including a requirement for a Special Area Permit for any activity that may damage refuge resources, disturb wildlife or disrupt existing public uses Management of species harvest would be unaffected by the change in land status from general state land to refuge land. However, the Izembek State Game Refuge plans states that the Alaska Department of Fish and Game will work with the Department of Natural Resources to prepare mineral leasehold location orders for the Izembek State Game Refuge, and also recommend that the Department of Natural Resources not offer offshore prospecting permits or leases within the refuge. The departments will recommend that the legislature close the refuge to new locatable mineral entry, mineral prospecting, and mineral leasing under AS 38.05.185-38.05.300.</p>
	<ul style="list-style-type: none"> <li>• There are 41,887 acres on the state parcel that have important subsistence resources which will be added to the National Wildlife Refuge System. These lands, along with the lands on Sitkinak Island, are not areas of traditional subsistence use by local residents.</li> </ul>	<p>See above response to SER SUB 03.</p>

SOC Code	Statement of Concern (SOC)	Response
SER SUB 04	The southern road corridor will have fewer effects on future subsistence use of caribou than the central corridor. This is because more of the caribou migration route will remain in its existing condition. The Final EIS should take this into consideration.	A discussion of the impact of the two road alignments on regional caribou population and their migration routes occurs in Section 4.3.2.5.
SER SUB 05	The southern road corridor crosses fewer existing roads and trails used for traditional access, resulting in fewer negative effects on subsistence use in the project area. The Service should acknowledge these distinctions between alternatives, and also note that traditional subsistence access will be maintained in accord with the provisions of ANILCA.	Sections 4.3.3.7 and 4.4.3.7 assess the effect of road access on subsistence resources. Neither section conducts a comparison of impacts for road alternatives in relation to existing subsistence trails within the Izembek National Wildlife Refuge. Generally, both Alternative 2 and 3 are assumed to provide a small measure of improved access to subsistence resources.
SER SUB 06	Closure of the Izembek Wilderness area surrounding the proposed road corridor to off-road vehicle use for subsistence purposes through future federal regulation could be considered a negative effect on access to subsistence resources, even though there would be improved access for street vehicles. The Service should consider replacing text found on Draft EIS p. 4-203, Section 4.3.3.7, Paragraph 4 to read:	The Service does not agree that closure of the Izembek Wilderness area surrounding the proposed road corridors to future use of all-terrain vehicles for subsistence access would be a negative effect. There is no established pattern of all-terrain vehicle use in the area around the proposed road corridors. By local agreement and one formal closure, subsistence use of off road vehicles within Izembek National Wildlife Refuge has been limited to the existing road and trail system within the refuge. We believe the analysis presented in Section 4.3.3.7 is accurate and have not made the requested change. Closure of wilderness lands adjacent to any new road would be one of the required mitigation measures and would follow the required rule making process outlined in 50 CFR 36.12

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Although the off-road use of off-road vehicles for subsistence in the wilderness area would likely be restricted through future federal regulation, the operation of the southern road alignment under Alternative 2 would result in minor improvements in access to subsistence waterfowl and salmon resources near Kinzarof Lagoon.</li> </ul>	See above response.
SER SUB 07	The EIS should reflect that local residents would be able to use the road to help ease travel time and logistics around going subsistence hunting in the Cold Bay area. Being able to easier access subsistence hunting in Cold Bay will help residents get ready for winters.	Sections 4.3.3.7 and 4.4.3.7 assess the effect of a road on access to subsistence resources. Both sections determined that road access to new subsistence resources would likely have a minor but positive increase on subsistence harvest levels.

## Socioeconomic Resources – Wilderness (SER WILD)

SOC Code	Statement of Concern (SOC)	Response
SER WILD5	Comments on changes to wilderness values in the Izembek Wilderness related to the conveyance of the selection or construction of the proposed road.	Category Code; no response required.
SER WILD 01	With respect to the Wilderness Act, the Draft EIS fails to discuss the unacceptable precedent that the proposed land exchange and road would set if approved. The Service has a responsibility to permanently protect wilderness and never barter it away for political or other purposes. The road would be the first ever to bisect a congressionally-designated wilderness, the highest level of land protection that can be bestowed by the United States. The precedent opens the door for other wilderness areas to be destroyed - not only on refuges, but national parks, forests and other federal lands using land trades as a vehicle to develop wilderness lands. The Draft EIS uses the four qualities of wilderness character that are more tangible and more easily measured but fails to acknowledge that there is a suite of intangible qualities that are also associated with wilderness character. The Final EIS should include a complete presentation of how the proposed land trade and road would affect these intangible values and set a precedent, and should evaluate the impact to refuges nationwide by the de-designation of a wilderness for a land exchange.	<p>There have been prior declassifications of wilderness, but they have generally consisted of boundary adjustments. There have been other wilderness land exchanges to accommodate development (i.e., Glacier Bay National Park/Gustavus hydro-power).</p> <p>The discussion in Section 4.3.3.10 Wilderness, associated with Wilderness Values, has been revised to include more on the intangible qualities associated with wilderness character. These potential impacts were also considered in the summary discussions of impacts related to Alternatives 2 and 3 (4.3.3.10 and 4.4.3.10).</p>

SOC Code	Statement of Concern (SOC)	Response
SER WILD 02	The construction of the road under Alternative 2 or 3 would have devastating impacts on the wilderness character of the Izembek Wilderness. The resulting loss of wilderness character goes beyond the basic tenets of Wilderness Act values to be protected (such as solitude and an untrammelled landscape):	Impacts to wilderness character associated with Alternatives 2 and 3 were assessed based on four qualities of wilderness. Possible impacts related to the integrity of habitat for plant and animal species and habitat fragmentation are discussed in Section 4.3.3.10 (Wilderness), under the Natural Quality heading. Alternatives 2 and 3 were found to have permanent, high intensity direct impacts to the natural quality of wilderness character through the ecological fragmentation of previously contiguous wilderness lands. The concept of wilderness as a source of escape and renewal is discussed in Section 4.3.3.10 (Wilderness Values). The discussion of nonuse values of wilderness was expanded and considered in the summary discussions of impacts related to Alternatives 2 and 3 (4.3.3.10 and 4.4.3.10).
	<ul style="list-style-type: none"> <li>• Integrity of habitat for rare plant and animal species</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Unfragmented habitat</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Source of escape and renewal for human populations</li> </ul>	See above response.
SER WILD 03	The Draft EIS fails to clearly indicate that the King Cove Corporation lands, which would be transferred to the Service and become wilderness under the proposed land exchange, have lower wilderness quality than the existing Wilderness lands that would be lost to road construction. This is yet another example of the Draft EIS providing an incomplete evaluation of the proposed exchange and creating the false impression that net benefits to Wilderness would occur. In fact, the opposite is true and the Draft EIS should be revised to reflect this.	The Service requested information associated with the wilderness characteristics of the exchange parcels from King Cove Corporation and from the State of Alaska to assist with the analysis of wilderness characteristics. All available information on the exchange parcels has been included in the EIS and incorporated into the analysis of alternatives. No text edits were made in response to this comment.

SOC Code	Statement of Concern (SOC)	Response
SER WILD 04	The bollard/chain barrier associated with the proposed roads under Alternatives 2 and 3 would also have significant impacts on the wilderness values of Izembek as it would be visible from the refuge, although not having it would also result in significant impacts. The Draft EIS should be revised to reflect this.	The discussion of direct and indirect effects under Sections 4.3.3.10 (Wilderness, Alternative 2) was revised to include impacts to wilderness character associated with the views of the bollard/chain barrier. Discussion of impacts to wilderness character associated with the bollard/chain barrier and access are already included in the sections listed above.
SER WILD 05	The Draft EIS incorrectly claims that “[a]ctions that intentionally manipulate or control ecological systems inside wilderness degrade the untrammeled quality of wilderness character.” The Wilderness Act does not invoke “intentionality” into the untrammeled concept. Any action that manipulates or controls ecological systems inside wilderness, intentional or unintentional, degrades the untrammeled quality. The Draft EIS should correctly represent this important distinction.	Agreed. Section 3.3.10 (Wilderness) and an associated discussion related to the untrammeled quality in Chapter 4 (Section 4.3.3.10) was revised to reflect this.
SER WILD 06	The Draft EIS effects analysis for wilderness does not adequately consider the overall effect of resources that will be added to the National Wilderness Preservation System and the National Wildlife Refuge System and should be revised. The Draft EIS provides the general public a distorted effect of each alternative. There is no overall description of the potential negative effects by focusing narrowly on the Izembek Wilderness within the Isthmus between the Izembek Lagoon complex and Kinzarof Lagoon, and there is no overall description of the unique resources that will be removed from the Izembek wilderness under Alternatives 1, 4, and 5. A summary comparison table should be included in the EIS that shows the acres of Wilderness added or removed from the National Wilderness Preservation System [see Table 17 on p. 43 of King Cove Group Consolidated Comments on the Draft EIS].	The Service requested information associated with the wilderness characteristics of the exchange parcels from King Cove Corporation and from the State of Alaska to assist with the analysis of wilderness characteristics. All available information on the exchange parcels has been included in the EIS and incorporated into the analysis of alternatives. A summary comparison table that shows the acreages of Wilderness added or removed is included in the EIS (Table ES-2, also in Chapter 2). No text edits were made in response to this comment.

SOC Code	Statement of Concern (SOC)	Response
SER WILD 07	The impact discussion on wilderness characteristics in the Draft EIS should be revised to address the following points:	<p>The discussion of direct, indirect, and cumulative effects to wilderness associated with Alternative 1 was revised based on the new configuration of the alternative. References to the hovercraft operations on Pages 4-92, 4-93, and in the mitigation measures paragraph of Section 4.2.3.10 were revised accordingly.</p> <p>Discussions of direct and indirect effects under Alternative 1 are relaying the status quo of actions, including effects of the King Cove Access Project road. Existing external actions are still subject to analysis as they relate to a new proposed action.</p> <p>The cumulative effects summary conclusion for impacts to wilderness associated with Alternative 1 does not meet the criteria for a major rating. ANCSA established the right to select lands, which predated the establishment of the wilderness under ANILCA. Thus, this selection is an existing condition, not a direct effect of Alternative 1.</p> <p>For analysis purposes, as identified in Table 4.1-3, context is one of the criteria used to determine impact levels for effects on wilderness character. Unique context is defined in that table as: "The lands in question are protected by legislation and managed for wilderness characteristics." Izembek Wilderness falls into this category."</p>
	<ul style="list-style-type: none"> <li>• Delete sentence on hovercraft which is stand-alone [Draft EIS p. 4-92, third paragraph]</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>• Delete reference to hovercraft on Draft EIS page 4-93.</li> </ul>	See above response.

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>Why are existing approved effects of King Cove Access Project road construction listed as if new effects? These are approved and not subject to this analysis. If mentioned, the fact that these are not part of the projects needs to be clearly stated.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Effect on wilderness and cumulative effects should be major. This meets the long term, permanent, measurable effects described on Draft EIS Page 4-4.</li> </ul>	See above response.
	<ul style="list-style-type: none"> <li>Delete mitigation measures since no hovercraft use.</li> </ul>	See above response.
	Clarify how the Izembek Wilderness is somehow unique as represented in the following conclusion "Due to the unique context of the Izembek Wilderness, the direct and indirect impacts to the wilderness character ... would be considered major" [Draft EIS pg. 4-214]. There are over 50 million acres of designated wilderness in Alaska and over 100 million acres nationally. We request any modifier that portrays the Izembek Wilderness as a unique resource, based solely on it being designated wilderness, be removed.	See above response.
SER WILD 08	The Service needs to consider the intent of the area designated as wilderness and how this intent would be disrupted from road construction and operation as changes could occur to the areas water patterns, wildlife, wilderness character, noise and would invite traffic, emissions and potential petroleum leaks and pollution. Road building is considered detrimental and would divide the wilderness area, and undermine the intent that designated these types of areas as wilderness. If designated wilderness areas are divided into pieces the integrity of the whole ecosystem becomes compromised. The road is not in the public interest of protecting designated wilderness areas.	Impacts to wilderness character associated with Alternatives 2 and 3 were assessed based on four qualities of wilderness. Possible impacts to hydrologic processes and wildlife movement, potential introduction of pollutants, habitat fragmentation, and other impacts are discussed in Section 4.3.3.10 (Wilderness), under the Natural Quality heading. Alternatives 2 and 3 were found to have permanent, high intensity direct impacts to the natural quality of wilderness character through the ecological fragmentation of previously contiguous wilderness lands. No text edits were made in response to this comment.

SOC Code	Statement of Concern (SOC)	Response
SER WILD 09	<p>Commenters noted that national wildlife refuges and wilderness areas belong to all Americans and needs to be preserved without development for future generations of humans to enjoy undisturbed. Wilderness areas that are as of high value and as ecologically important as Izembek do not need access, and that these areas need unyielding protection and should remain untouched or degraded by human activity and building a road would be in direct contrast to this concept. Designated wilderness areas such as Izembek National Wildlife Refuge are becoming increasingly rare in the U.S. and need to remain undisturbed.</p>	<p>The concept of impacts to Izembek Wilderness being felt by all Americans is discussed in Section 4.3.3.10 (Wilderness Values). The discussion of nonuse wilderness values was expanded and considered in the summary discussions of impacts related to Alternatives 2 and 3 (4.3.3.10 and 4.4.3.10)</p>
SER WILD 10	<p>Commenters noted that road could be constructed and managed to minimize any adverse impacts to the Izembek National Wildlife Refuge, the Izembek State Game Refuge and the important resources they were created to protect and conserve. Commenters noted that they are not trying to set a precedent for future roads within wildernesses areas of the United States, but are instead asking for an exchange of land that would allow safe access to Cold Bay via a road.</p>	<p>Mitigation measures are discussed under each resource category, for each alternative that was analyzed. These mitigation measures are intended to minimize any possible adverse impacts to lands within the project area resulting from the proposed action.</p> <p>Safe and reliable transportation access is part of the project's Purpose and Need. No text edits were made in response to this comment.</p>

SOC Code	Statement of Concern (SOC)	Response
SER WILD 11	<p>The Service needs to consider that in the wilderness section at Chapter 4 does not present a full and fair discussion as required by NEPA (40 CFR 1502.1), and must be significantly revised in the Final EIS to address the following issues. Despite the fact that as a result of the land exchange the Izembek Wilderness would gain approximately 41,000 acres, this analysis focuses almost entirely on the impacts of a loss of approximately 130-150 acres. The only value attributed to the added wilderness acreage is characterized as "The magnitude of this impact would be considered medium ..." ([we] assume positive) but is immediately dismissed with the following statement "... the parcels that are identified for addition to Izembek Wilderness are adjacent to existing wilderness and would not noticeably change the overall character of existing wilderness" [Draft EIS p 4-210]. There is much discussion about what would be lost in terms of recreational opportunities, ecological integrity, visual and noise disturbances as a result of the proposed road corridor; however, there is no recognition that the lands gained in the exchange would increase the acreage of the Izembek Wilderness by nearly 20 percent; the majority of which would be far enough away from the proposed road so as to not affect visitors' wilderness experiences or be threatened by invasive species. The benefits associated with the designated wilderness gained in the land exchange must also be identified and factored into the analysis in accordance with 40 CFR 1508.8, which defines "effects" to include " ... those resulting from actions which may have both beneficial and negative effects."</p>	<p>The beneficial or adverse impacts tied directly to the acreages associated with the proposed land exchange in Alternatives 2 and 3 cannot be directly compared to one another. While there would be a large amount of acreage added to the National Wilderness Preservation System, this would not offset the habitat fragmentation of bisecting of wilderness lands in the isthmus of Izembek National Wildlife Refuge. The issue is around the fragmentation of wilderness, not the numbers of acres being added to or removed from wilderness. Text has been added to Sections 4.3.3.10 and 4.4.3.10 of the document.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>[Draft EIS Page 2-75-76 Wilderness/Cumulative Effects: Alternative 1] No hovercraft means 5,430 acres of unique Izembek Wilderness will be transferred to the King Cove Corporation. Alternative 2 and Alternative 3. The effects are major but these are major (beneficial). The addition of the wilderness acreage is not properly evaluated.</li> </ul>	See above response.
SER WILD 12	<p>The discussion under "Undeveloped Quality" acknowledges that the Alaska National Interest Lands Conservation Act allows the use of snowmachines, motorboats, airplanes and subsistence use of off-road vehicles in designated wilderness. However, the analysis does not factor in these other modes of access and attributes the "high intensity, permanent, regional impacts to a unique resource," to what is expected to be "low levels of daily traffic" on the proposed road, and a potential for unspecified "unauthorized motorized use" on adjacent wilderness lands, even though the proposed road would include barriers to prevent access to adjacent lands [Draft EIS p 4-212]. Essentially, the only motorized modes of transportation not currently allowed in the Izembek Wilderness are road vehicles and recreational off-road vehicle use. If the Service tolerated unauthorized use to the extent that it would cause major damage to refuge resources, it would not be fulfilling its legal requirements under ANILCA and the Refuge Improvement Act. Given this baseline, the level of impact resulting from both legal and unauthorized motorized use on designated wilderness would be considerably less than concluded in this section.</p>	<p>ANILCA Section 811 states that "the Secretary shall permit on the public lands appropriate use for subsistence purposes of snowmobiles, motorboats, and other means of surface transportation traditionally employed for such purposes by local residents, subject to reasonable regulation." In some instances the "other means of surface transportation" has included off-road vehicles. By local agreement and one formal closure, subsistence use of off road vehicles within Izembek Refuge has been limited to the existing road and trail system within the refuge. ANILCA Section 1110 (a) allows the use of snowmobiles, motorboats, airplanes and non-motorized surface transportation methods for traditional activities and for travel to and from villages and homesites. Both these permission's are subject to reasonable regulations and 50 CFR 36.12 and 50 CFR 36.42 respectively outline the process for the Service to limit subsistence and general access. The State of Alaska restricts to landing of airplanes for hunting within the Izembek Wilderness, therefore there is a very limited amount of motorized access occurring within the Wilderness as described in Chapter 3, Section. 3.3.10.2.</p> <p>Regarding the statements on Chapter 4, specifically in Section 4.3.3.10, the sentence relating to state ownership of submerged lands has been modified to indicate that there are no reasonably foreseeable future actions that would affect the undeveloped quality of these areas. Revisions have been made in Section 4.3.3.10.</p>

SOC Code	Statement of Concern (SOC)	Response
	<ul style="list-style-type: none"> <li>State ownership of submerged lands within the exchange parcels is also discussed in the "Undeveloped Quality" section as being detrimental - "potentially compromising the Service's ability to protect the wilderness character of the area" [Draft EIS p 4-212]. Given that the same land ownership pattern exists on current refuge lands, and the Service determined in this Draft EIS that the "trend for [all] qualities of wilderness character is currently stable" [Draft EIS p 3-347 through 3-349], it is unlikely that these state inholdings would negatively impact wilderness character on refuge lands in the future.</li> </ul>	See above response.
SER WILD 13	<p>The proposed land exchange of this magnitude and complexity would be a horrible precedent for wilderness, and the Congress made an error when it gave the decision making process to the Secretary of the Interior. Wilderness is considered the highest level of public land protection and boundary tampering should be done with extreme caution if at all. A commenter proposed that there should be only two criteria for modifying wilderness boundaries wherein a land exchange is involved: 1) there would be an overwhelming preponderance of benefit to the wilderness, and 2) where the failure to do so would result in unacceptable offsite environmental impacts. Neither of these criteria is met in this instance of the proposed exchange.</p>	<p>The impacts to wilderness and wilderness character are analyzed in Chapter 4. Congress directed that the Service conduct this EIS to evaluate a proposed land exchange for the purpose of constructing a road. The EIS documents how the proposed action and its alternatives meet the purpose and need of the land exchange and evaluates the environmental impacts of the alternatives. No text edits were made in response to this comment.</p>

## Comment Acknowledged (ACK)

SOC Code	Statement of Concern (SOC)	Response
ACK	Submissions without substantive comments and/or duplicate submissions.	Category Code; no response required.
ACK 01	Comment Acknowledged.	Non-substantive comments; no response required.

**APPENDIX G-1**

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**UNIQUE SUBMISSION AND COMMENT INDEX**

<b>Commenter</b>	<b>Submission ID</b>	<b>Comments</b>
Name Withheld	31680	ACK 01
Name Withheld	31689	BIO BIO 01, SER REV 04
Name Withheld	37371	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	37386	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	37416	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	37419	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	43913	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Name Withheld	44010	ACK 01
Name Withheld	44012	ACK 01
Name Withheld	44072	SER WILD 01
Name Withheld	44090	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	44108	BIO BIO 01
Name Withheld	44134	ACK 01
Name Withheld	44181	ACK 01
Name Withheld	44210	ACK 01
Name Withheld	44225	ACK 01
Name Withheld	44232	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	44248	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	44253	ACK 01
Name Withheld	44263	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	44281	ACK 01
Name Withheld	44309	ACK 01
Name Withheld	44315	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	44343	SER WILD 01
Name Withheld	51018	ACK 01
Name Withheld	51075	ACK 01
Name Withheld	51079	P&N 06, SER WILD 09
Name Withheld	51095	SER WILD 01
Name Withheld	51124	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51132	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

<b>Commenter</b>	<b>Submission ID</b>	<b>Comments</b>
Name Withheld	51137	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51147	ACK 01
Name Withheld	51170	SER WILD 01
Name Withheld	51186	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51242	ACK 01
Name Withheld	51243	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Name Withheld	51291	ACK 01
Name Withheld	51310	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51320	SER WILD 09
Name Withheld	51349	SER WILD 01
Name Withheld	51397	ACK 01
Name Withheld	51408	BIO BIO 01, BIO WILD 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51421	BIO BIO 01
Name Withheld	51432	BIO BIO 01, REG 03, SER WILD 01, SER WILD 09
Name Withheld	51470	ACK 01
Name Withheld	51471	ACK 01
Name Withheld	51500	ACK 01
Name Withheld	51514	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51542	ACK 01
Name Withheld	51553	ACK 01
Name Withheld	51588	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51601	ACK 01
Name Withheld	51604	SER WILD 01
Name Withheld	51634	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51679	ACK 01
Name Withheld	51688	SER WILD 01
Name Withheld	51720	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51737	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51746	ACK 01
Name Withheld	51753	SER WILD 02

Commenter	Submission ID	Comments
Name Withheld	51761	BIO VEG 03, BIO WILD 26, EDI 06, IAM 03, MIT 01, MIT 02, MIT 07, P&N 01, P&N 09, PAA 07, PAA 09, REG 13, REG 26, SER LAND 03, SER REV 11
Name Withheld	51816	SER WILD 01
Name Withheld	51903	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51905	ACK 01
Name Withheld	51941	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Name Withheld	51993	P&N 01, P&N 11, PAA 15, PAA 18, PAA 21, SER REV 03, SER REV 04, SER REV 09
Asla, Alina	51144	SER WILD 02
Abrams, Rochelle	44242	ACK 01
Acker, Robert	52347	SER REV 09
Acora, Frederica	51549	ACK 01
Adams County Environmental Task Force (Snyder, Brett)	51440	BIO BIO 01, SER WILD 01
Adams, Jim (Alaska National Wildlife Federation)	31763	PAA 03, PAA 26, REG 08
Adare, Darley	37414, 45041	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Adsit, Roy	51444	ACK 01
Agdaagux Tribal Council (Gould, Dale)	52030	HIST 07, SER H&S 01
Agdaagux Tribe of King Cove (Gould, Dale)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12,

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		PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Aguirre, Tjanya	66327	ACK 01
Agyeman, Nketia	51766	ACK 01, P&N 03, SER EJ 01, SER LAND 06, SER ROAD 04
Ahlstrand, Heidi	51280	ACK 01
Aichele, Brian	62855	P&N 08, SER H&S 04, SER REV 08
Aiken, Ed	44219	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Alaska Center for the Environment (Connor, Valerie)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Alaska Crab Coalition (Thomson, Arni)	33123	ACK 01

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Alaska National Wildlife Federation (Adams, Jim)	31763	PAA 03, PAA 26, REG 08
Alaska Native Health Board (Unok, Alberta)	33120	HIST 03, P&N 03, SER EJ 01, SER LAND 01, SER LAND 06, SER ROAD 04
Alaska Wilderness League (Miller, Kristen)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Alaska Wilderness League (Shogan, Cindy)	31763	PAA 03, PAA 26, REG 08
Albers, Carla	51110	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Aldrich, James	51644	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Aleman de Gallardo, Stella	51458	ACK 01
Aleutian Pribilof Islands Association, Inc. (Philemonof, Dimitri )	52021	HIST 03, P&N 03, SER EJ 01, SER LAND 06, SER ROAD 04
Aleutians East Borough (Mack, Stanley)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07,

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		IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Aleutians East Borough (Rowley, Dan)	31760	SER ROAD 02
Alex, Deann	51807	SER WILD 01
Alexander, Gunta	53079	BIO BIO 01, SER REV 09
Alexander, J	44323	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Allen, Brian	51003	ACK 01
Allen, Cat	37411	SER WILD 01
Allen, Kristina	96632	ACK 01
Allen, Peter	84366	ACK 01
Allen, Vickie	44011	BIO BIO 02
Alvarez, Diane	51771	HIST 03, P&N 03, SER EJ 01, SER LAND 06, SER ROAD 04
Amelang, Loren	51492	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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American Birding Association (Gordon, Jeffery A.)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
American Rivers (Williams, Christopher E)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Ananthakrishnan, Revathi	44184	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Anavi, Teresa	37355	BIO BIO 01, SER WILD 01
Anchorage, Public Meeting	51920	BIO WILD 01, BIO WILD 03, BIO WILD 26, COOP 01, EDI 07, HIST 02, HIST 03, HIST 04, HIST 05, IAM 01, P&N 01, P&N 03, P&N 07, P&N 08, P&N 11, PAA 02, PAA 03, PAA 26, PHY AQ 02, REG 02, REG 12, SER CUL 01, SER CUL 02, SER H&S 02, SER H&S 04, SER H&S 05, SER H&S 07, SER LAND 01, SER LAND 03, SER LAND 04, SER LAND 06, SER LAND 11, SER REV 09, SER REV 11, SER ROAD 01, SER ROAD 10, SER SER 02, SER SUB 01, SER WILD 01, SER WILD 02, SER WILD 10, SER WILD 13
Anderson, Bob	31742	ACK 01

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Anderson, Judith	51481	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Anderson, Peter	51883	P&N 06, SER LAND 01, SER REV 09, SER WILD 01
Anderson, William, D	44330	BIO BIO 01, SER REV 04, SER WILD 01
Andes, John	52938	BIO BIO 01, BIO BIO 02, REG 03
Andre, Kathryn	43806, 51623	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Ann Cohen, Judy	32441, 32443, 51653	BIO BIO 01, REG 03, SER WILD 01
Anna Denison, Lou	44348	BIO BIO 01, SER REV 04
Anne Joyce, Mary	51123	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Anneconne, Lisa	51100	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Anth, Frances	37356	SER WILD 01
Antoine, Bernadette	48684, 51070	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Apfelbaum, Sally	44310	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Appelbaum, Barbara	31676	SER WILD 09
Aquilina, James	51892	ACK 01
Arden, Brigitta	51386	BIO BIO 01, P&N 06, SER WILD 01
Arent, Rod	51945	P&N 01, P&N 02, REG 02, SER REV 09, SER WILD 01
Arkley, John	51919	SER REV 03, SER REV 04
Armao, Terri	51445	BIO BIO 01, SER WILD 01
Armerding, Christopher	73516	ACK 01
Armoogam, Tracy	51888	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Aron, Sissy	52074	REG 03
Artin, Tom	43984	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Ascot, Karin	51121	SER WILD 02
Ashley, Edward	44114	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 09
Ashton, Joan	51632	BIO BIO 01, P&N 06, SER LAND 01
Attebury, Diane	44019	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Audubon Alaska (Warnock, Nils)	31763	PAA 03, PAA 26, REG 08

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Audubon Alaska (Warnock, Nils)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Austin, Darin	51490	SER WILD 01, SER WILD 02
Austring, Dee	31684	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Ava L, Bariana	43950	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Avery, Bonnie	37763, 51543	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Avery, Sara	51190	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Avila, Ron	44295	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Avr, Helen	44154	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Aydelott, Ruth	51691	ACK 01
Azzarello, Kristine	37434	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
B, John	51496	PAA 17
Babcock, Glen	62856	SER H&S 04
Bagwell, Knox	44437	P&N 01, P&N 02, REG 02, SER REV 09, SER WILD 01
Bahama, Bahama	31630	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Baier, Stacie	44195	BIO BIO 01
Bailey, Edgar	31755	P&N 01, SER ROAD 01, SER WILD 01
Bailey, Lee	44115	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bain, M	51677	SER WILD 09
Bakall, Connie	53197	BIO BIO 01, REG 03

Commenter	Submission ID	Comments
Balder, James	48933, 51643	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Baldwin, Lee	31642, 43935	ACK 01, P&N 06, P&N 07, SER WILD 09
Baldwin, Robert L	51980	SER LAND 01, SER WILD 01
Balik, Susan	51649	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04
Balogh, Alana	31671	ACK 01
Balogh, Holly	51898	P&N 02, SER WILD 01
Banwart, Albert	52170	REG 03
Barfield, Bonnie	51735	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Barger, Julie	37425	SER WILD 02
Bargiel, Paula	33478, 44193	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Barker, Marie	51074	ACK 01
Barnard, Grant	31751	REG 03
Barnett, Bob	51769	P&N 03
Barnhart, S	51066	REG 02
Baron, Sharon	51942	ACK 01
Barquin, Conchita	51056	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Barreras, Terri	44305	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Barrett, Carolyn	51593	ACK 01
Barrett, Mary	31593	P&N 01, P&N 06, PAA 25, REG 02, SER LAND 01
Barrington, Craig	44194	BIO BIO 01, P&N 02, SER REV 04, SER WILD 01
Barry, Susan and Paul	51565	BIO BIO 01, SER LAND 01
Bartell, Lee	53195	REG 02
Bartindale, J	95990	ACK 01
Bartlett, Mary	51370	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Basnar, Lee	41227, 44328	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Battles, Brooke	86774	ACK 01
Bauer, Joanne	51603	ACK 01
Baxter, Joslyn	36116, 44003	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Kachemak Bay Conservation Society <a href="#">Highland, Roberta</a>	51034	BIO BIO 01, P&N 06, SER WILD 01
Beal, Carrie	44282	ACK 01

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Beal, Dick	44005	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bear, Janet	52032	SER H&S 04, SER SER 01
Beattie, Jane H	51562	ACK 01
Beavers, Nancy	51413	BIO BIO 01, P&N 06, SER LAND 01, SER REV 09, SER WILD 01
Bechtel, Paul	37399	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Becker, Bill	31602	ACK 01
Beckett, Gail	51116	ACK 01
Beckett, Jeneen	31625	P&N 01, SER WILD 08
Beckman, Mary	51106	SER WILD 01
Bedinger, Gail	37393	ACK 01
Bedrick, Sue	51375	BIO BIO 01, SER WILD 01
Beery, Candace	31757	SER EJ 02, SER H&S 04
Belcastro, Frank	31790, 51508	BIO BIO 01, REG 03, SER WILD 01, SER WILD 02
Belkofski Tribal Council (Kenezuroff, Leff )	52033	ACK 01, HIST 04, SER H&S 04
Belkofski Tribal Council (Kuzakin, Simeon)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01,

Commenter	Submission ID	Comments
		SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Belkofski Tribal Council (Kuzakin, Simeon)	52035	ACK 01, HIST 04, P&N 08, REG 24, SER CUL 02, SER H&S 04
Beller, Melanie (The Wilderness Society)	31763	PAA 03, PAA 26, REG 08
Belt, Annie	51167	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bendixen, Becky	51772	HIST 03, P&N 03, SER EJ 01, SER LAND 06, SER ROAD 04
Bendixon, Harold	62857	P&N 08, SER H&S 04
Benes, Michelle	32224, 43925	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Benford, Alan	44190	REG 02
Benjamin, Jimmy	44136	BIO BIO 01, BIO BIO 02, P&N 06, SER LAND 01, SER REV 11, SER WILD 01
Bennett, Marcia	51051	ACK 01
Benson, Barb	51516	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bergstrom, Gina	44157	ACK 01
Berkeley, Carol	31663, 34013	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01, SER WILD 08
Bernard, William	51163	ACK 01
Berrien Zettler, H	51145	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Berson, Harriet	44164	BIO BIO 01, P&N 02
Beschler, Marc	51541	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bessette, Eric	51498	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Betancourt, Cheryl	51466	SER WILD 09
Beverly, Jessica	51174	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Beves, Peter	31619, 51446	BIO BIO 01, BIO VEG 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bezugolnaya, Ksenia	62907	ACK 01
Biaggi, Elsa	51119	BIO BIO 01
Biggs, Susan	31641, 31938	ACK 01, BIO BIO 01, REG 03, SER WILD 01
Bik, Thomas	52328	SER REV 09
Bikulcs, L.	51505	ACK 01
Billmaier, Michelle	51109	SER WILD 01
Bingham, Donald	51325	ACK 01
Birkhimer, Darrell & Cindy	51076	P&N 01, P&N 06, SER WILD 01
Bishop, Norman	44043	BIO BIO 01, P&N 06, SER WILD 01
Blackfoot, Joshua	43936	SER WILD 09
Blaeloch, Janine (Western Lands Project)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Blair, David	52315	P&N 02
Blalack, Russell	51665	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Blane, Deedee	51587	ACK 01
Bledsoe, Richard	31598, 51484	ACK 01, BIO BIO 01, P&N 06, SER LAND 01, SER SUB 01, SER WILD 01
Bleecker, Sam	37385	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bloomer, Jerry and Susanne	51415	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Blue Goose Alliance (Fowler, Roanld )	31763	PAA 03, PAA 26, REG 08

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Blue Goose Alliance (Fowler, Ronald )	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Bobroff, Marc	51324	BIO BIO 01, P&N 02
Boehling, Burton	31644	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Boehling, Burton, R	44293	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bohac, Stephen	37370, 46691	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Boka, Erika	51177	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bolbol, Deniz	36366, 51002	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01, SER WILD 02
Bolton, Randy E	51388	P&N 02, SER WILD 01
Bonk, Marliese	44188	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bonvouloir, A	51642	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Boone, Joseph	45765, 51655	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Booth, Jeb	31631, 51045	ACK 01
Borie, Edith	52969	SER REV 04
Boris, Christina	51789	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bosch, Shirley	51515	ACK 01
Botterbusch, Jennie	51365	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Boudreau, Lucinda	31609, 31864, 31869	ACK 01, BIO BIO 01, BIO WILD 01, PHY CON 04, REG 03, SER WILD 01
Boulton, Jenny	51707	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02

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Bowen, Andrea	80491	ACK 01
Bowley, Robert and Jean	51695	REG 03
Bowman, Stacy	51390	ACK 01
Boynton, Dalton	44039	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bozoian, Stephen	53334	REG 03
Bradbury, Jeanne	51714	ACK 01
Brainerd, Tim	51996	ACK 01
Brammer, Sidney	44150	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Brandell, Bethany	62858	P&N 08, P&N 14, SER H&S 04, SER REV 08
Brandell, Brandon	62859	SER H&S 04
Brandell, Charlynn	62860	SER H&S 04
Brandell, Jaden	62861	P&N 08, P&N 14
Brandell, Jager-Sean	62862	ACK 01
Brandell, Jailynn	62863	P&N 14
Brandell, Leilonnie	62864	SER H&S 04
Brandell, Nelson	62866	P&N 14
Brandell, Trevor	62865	P&N 03, SER H&S 01, SER H&S 02
Brandt, Vicky	37433	BIO BIO 01
Breier, Rene	51381	REG 03, SER WILD 01
Brenner, Jared	37376	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Brink, K	52152	SER REV 09
Brisco, Austin	51940	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Brissette, Pamela	43912	BIO WILD 01, SER LAND 01, SER REV 09, SER WILD 01
Brister, Bob	31734	SER WILD 01
Brister, Bob	44304	SER WILD 02
Brocius, Pamela	44086	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Brock, Jason	44300	SER WILD 01
Bröcker, Ingrid	43952	SER WILD 09
Brookman, Gerald	51000	BIO WILD 01, P&N 04, SER LAND 01, SER WILD 01
Brown, Helene	31608	SER REV 02
Brown, Jim	31612	ACK 01, BIO WILD 03
Brown, Liz	51378	SER WILD 09
Bruckman, Lenny	44089	ACK 01
Brumby, Val	53121	P&N 02
Brumleve, Charles	31678	ACK 01

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Brunton, Jim	44317	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Bruton, Peggy	44238	ACK 01
Buck, Donald	44016	SER WILD 01
Buerger, Michelle	51504	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Bukovitz, Andy	37381	BIO BIO 01, P&N 02, P&N 06, SER LAND 01, SER REV 04
Bullock, Beth	51620	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Buness, Cynthia	32270, 37382	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Burghardt, Gordon	53062	SER WILD 01
Burkholder, Bob	70104	ACK 01
Burnett, John	44280	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Burnham, Andrew	51561	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Burns, Christina	52197	REG 03
Burns, Lyn	51742	ACK 01
Burns, N	73867	ACK 01
Burpo, Leslie	31723	ACK 01
Burrell, Lisa	51744	REG 03, SER WILD 01
Burson, Grace	51579	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Burt, Al	51260	ACK 01
Burton, Vic	51709	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Butler, Edward	51191	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Butler, Wm	51207	ACK 01
Bye, Barbara	51792	BIO BIO 01, P&N 06, REG 03
Byerley, James R	51125	SER WILD 01
Byers, Andrea	51001	SER WILD 01
Byrne, Anthony	51637	P&N 02
Cain, Barbara	53090	BIO WILD 01
Caldie, Cathy	51539	SER LAND 09
Calhoun, Helle	51547	BIO BIO 02
Californians for Western Wilderness,	51988	BIO BIO 01, BIO BIO 02, P&N 06, REG 03, SER LAND 01, SER REV 09, SER WILD 01
Callahan, Ann	51067	SER WILD 01
Cameron, Rick	37426	ACK 01

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Campanini, Susan M	44266	BIO BIO 01, P&N 06, SER LAND 01, SER WILD 01
Campbell, Benita	44259	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Camunas, Viola	51188	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Cannon, John	44187	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Capaccio, Iraida	44047	BIO BIO 01
Cappelletti, Gina	44100	ACK 01
Carey, Edward	32021, 44303	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Carlton, Gloria	31705	SER WILD 02
Carney, Diane	52338	BIO VEG 01
Carr, Gaile	86239	ACK 01
Carr, Jeffrey	44291	ACK 01
Carroll, Katy	51916	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Carroll, Liz	44311	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Carroll, Samantha (State of Alaska)	52000	BIO FISH 01, BIO FISH 04, BIO FISH 06, BIO VEG 02, BIO WET 03, BIO WET 05, BIO WET 06, BIO WILD 05, BIO WILD 20, BIO WILD 21, BIO WILD 22, BIO WILD 23, BIO WILD 24, BIO WILD 32, BIO WILD 33, BIO WILD 47, BIO WILD 48, COOP 01, DATA 04, DATA 17, DATA 19, DATA 20, DATA 24, DATA 30, EDI 02, EDI 03, EDI 04, EDI 05, EDI 06, IAM 02, IAM 03, IAM 10, MIT 02, MIT 04, MIT 09, MIT 10, MIT 14, PAA 01, PAA 06, PAA 20, PHY CON 02, PHY CON 03, PHY CON 05, PHY HYD 03, PHY HYD 05, PHY HYD 06, PHY PHY 02, PHY PHY 03, PUB 03, REG 06, REG 07, REG 15, REG 16, REG 17, REG 18, REG 19, REG 20, SER ARC 01, SER ARC 03, SER ARC 04, SER LAND 11, SER LAND 17, SER LAND 19, SER LAND 20, SER LAND 21, SER LAND 23, SER REV 02, SER REV 04, SER REV 05, SER ROAD 16, SER ROAD 18, SER ROAD 24, SER ROAD 27, SER ROAD 28, SER ROAD 29, SER ROAD 30, SER ROAD 31, SER ROAD 32, SER ROAD 33, SER ROAD 34, SER ROAD 35, SER ROAD 36, SER ROAD 37, SER SUB 01, SER SUB 06, SER WILD 07, SER WILD 11, SER WILD 12
Carrubba, Sandra	52570	BIO BIO 02

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Carson, Jo	51606	BIO BIO 01, P&N 05, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Carson, Joseph	51958	ACK 01
Carter, Pat	31616	ACK 01
Carter, Yvonne	42732, 51629	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Cartwright, Talula	51469	ACK 01
Carver, Cayla	62867	SER H&S 04
Casey, Carol	44339	SER REV 04, SER WILD 01
Cashman, Megan	44020	BIO WILD 01, SER WILD 01
Casler, Bruce	51762	BIO VEG 01, DATA 18, MIT 04
Cassidy, Judy	51369	ACK 01, BIO BIO 01, SER WILD 01
Castaline, Myrna	51621	ACK 01
Castle, Allison	33754, 51939	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Castle, Bill & Judy	44275	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Cellier, Alfred	51527	SER WILD 01
Cencula, Dave	51806	ACK 01
<i>Center for Biological Diversity</i> Noblin, Rebecca	31763	PAA 03, PAA 26, REG 08
<i>Center for Biological Diversity</i> Noblin, Rebecca	31761	ACK 01, BIO BIO 02, P&N 01, SER REV 04, SER ROAD 01, SER WILD 01
<i>Center for Biological Diversity</i> Noblin, Rebecca	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Cerello, Robert	53087	BIO BIO 01, SER REV 04
Chamlee, Carmelita	44033	SER LAND 01
Chapman, Zoe	44183	ACK 01
Chappellet, Sybil	51006	BIO BIO 01

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Char, Joseph	51650	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Charis, Barbara	51598	SER WILD 09
Charnes, Ruth	36150, 44140	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Chartier, Nancy	31749	SER WILD 09
Chase, Gib	52949	REG 03
Chazy, Cathy	44240	SER LAND 01, SER REV 04, SER WILD 01
Cheneby, Stef	51300	ACK 01
Chi, Carole	51552	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Chianis, Antonia & Andrew	44264	P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Chichester, Barbara	51803	ACK 01, BIO BIO 01, SER LAND 01, SER REV 04
Chien, Benny	44087	SER WILD 01
Childress, Ricky	37379	ACK 01
Chin, Jason	44338	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Church, Cassandra	51053	ACK 01
Cianelli, Bella	51088	ACK 01
Cindy, Anders	31656	ACK 01
Ciresi, Sandra	53341	SER REV 09
City of King Cove (Mack, Henry)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON

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		01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Clark, Isabel	52749	SER ROAD 01
Clark, Loralee	32868, 44221	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Clark, Susan	51884	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Clarke, Nick	44084	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Clark-Kahn, Lisa	51586	ACK 01
Clayton, Elizabeth	44058	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Clotworthy, Shawn	44333	P&N 06
Clusen, Charles M Natural Resources Defense Council	31763	PAA 03, PAA 26, REG 08
Clusen, Charles M Natural Resources Defense Council	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05

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Coates, Portland	31707, 34048	BIO BIO 01, P&N 02, P&N 06, SER REV 09, SER WILD 01
Cobb, Sandra M	51157	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01
Coburn, Julie-Bruce	44325	ACK 01
Cody, John	44329	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Coffey, Jill	51279	BIO BIO 01, SER WILD 01
Cohen, Ann	31613	SER WILD 08
Cohn, Sharilyn	43942	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Colberg, Edwin	44029	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Cold Bay, Public Meeting	52011	ACK 01, BIO WILD 03, BIO WILD 25, IAM 01, IAM 02, P&N 08, PAA 01, PAA 04, PAA 05, PAA 13, PAA 16, REG 02, REG 14, SER CUL 01, SER EJ 01, SER H&S 02, SER H&S 04, SER LAND 06, SER LAND 11, SER REV 11, SER ROAD 08, SER ROAD 11, SER ROAD 18, SER ROAD 34, SER ROAD 35
Cole, Elizabeth	44228	ACK 01
Cole, Jen	36950, 51229	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Coleman, Lissa	53233	REG 03
Coling, Marcia	51315	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Collette Pickeett, Shelly	51150	SER LAND 01, SER REV 04, SER WILD 02
Collins, Carol	32616, 34326, 37395	BIO BIO 01, P&N 06, REG 03, SER REV 04, SER REV 09, SER WILD 01, SER WILD 02
Collins, Joseph	44000	P&N 06, SER WILD 01
Collins, Peggy	51666	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Collins, Steve	37368	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Colton, Steve	51077	ACK 01
Combes, Steven	37364	ACK 01
Commons, Sandy	31600	BIO BIO 01, P&N 06, SER REV 04, SER SUB 01, SER WILD 01
Comstock, Ginger	51425	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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ConservAmerica (Jenkins, David)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Cook Inletkeeper (Shavelson, Bob)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Cook, Lizette	52444	SER WILD 02
Copeland, Thomas	43978	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Corcoran, Terry	51419	ACK 01
Corin, Lenny	31737	ACK 01, P&N 01, PAA 23, PAA 24, REG 04, REG 05, REG 06, SER EJ 02, SER LAND 01, SER SUB 01
Corley, Bert	35774, 51216	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Corrigan, Sean	31607, 42834	BIO BIO 01, BIO VEG 01, P&N 06, SER REV 04, SER REV 09, SER SUB 01, SER WILD 01
Couch, Sandra	31589	BIO WILD 01
Courtney, John	37394	ACK 01, SER WILD 09
Cowart, Mary	51362	ACK 01

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Cowin, Caryn	35261, 51022	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Crabill, Phillip J	43963	P&N 06, SER REV 04, SER WILD 01
Craig, Ella	51047	ACK 01
Cramer, Patricia	52838	BIO WILD 01
Crandall, Lynn	31624	P&N 01, SER WILD 07
Crandall, Lynn	52198	REG 03
Crawford, Nigel	31626	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Cressy, Norman	44106	BIO BIO 01, BIO WILD 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Crislip, Debora	52589	PAA 16
Crumbliss, Gina	53085	BIO BIO 01
Crupi, Kevin	51467	SER WILD 02
Cunningham, Barbara	43997	SER LAND 01, SER REV 04, SER WILD 01
Cunningham, Jim	51545	P&N 06, SER LAND 01, SER WILD 01
Cuviello, Pat	51520	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
D Ramos, Paul	44050	ACK 01
D. Muehlenkamp, Angela	51019	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Dacanay, C.	51111	ACK 01
Daetz, Douglas	31677	SER WILD 02
Dailey, Laura	51544	SER WILD 01
Dalka, Richard	51211	ACK 01
Dalpino, Jane	52948	SER WILD 08
D'Amato, Susan	31664	BIO BIO 01, P&N 06, SER LAND 01, SER ROAD 01, SER WILD 01
Dambrosi, AM	51215	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Dane, Trixi	44124	PAA 21
Daniels, Mark	52163	SER WILD 01
Danko, Lori	51929	ACK 01
Danner, Jennifer	31753	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Danner, Jennifer	52006	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
D'Antonio, Kitty	31712	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Darst, Kitty	51486	ACK 01
Dashe, Julia	51131	BIO BIO 01
Dass, B	51894	SER WILD 01

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David B, Scanlon	50999	P&N 06, SER REV 09, SER WILD 01
Davies, Margaret	51099	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Davis, Glenn	43982	P&N 01, P&N 06, SER REV 04, SER WILD 01
de Arteaga, Jose	44287	ACK 01
de la Giroday, Francois	51205	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Deacy, Robert	44162	ACK 01
Deane, Cody	31754	BIO WILD 01, PHY CON 04, REG 02, SER LAND 01, SER WILD 01
Defenders of Wildlife (Rappaport Clarke, Jamie)	31763	PAA 03, PAA 26, REG 08
Defenders of Wildlife (Dutton, Karla)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Defenders of Wildlife (Dutton, Karla)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
DeFerie, Steph	37374	ACK 01

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DeHaven, Laura	33721, 51263	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Delaney, Bob	44189	ACK 01
Della Femina, P	51813	ACK 01
Demarino, Amanda	38136, 51228	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Deming, Larry	44201	ACK 01
Denison, James	31727	SER WILD 08
DeQuasie, David	52531	BIO WILD 01
Derbenwick, Rebecca	53029	ACK 01, SER REV 04
Derepkowski, Jackie	52093	BIO BIO 01
D'errico, Didi	43910	ACK 01
Des, Marianne	52450	SER REV 04
DeSoto, Abigail	43998	BIO BIO 01, SER WILD 01
Devlin, Marybeth	51979	DATA 14, DATA 16, P&N 01, P&N 06, P&N 11, PAA 18, PAA 19, REG 12, SER REV 09, SER ROAD 26, SER WILD 01, SER WILD 08
Dickson, Michele	51126	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Diehl, Jodie	51337	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Dillon, Christi	44178	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
DiMatteo, Richard	51554	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
DiSimone, Christine	31604, 38149, 51538	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
DiVinere, Christine	44001	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Dixon, Kathleen	44278	SER LAND 01, SER REV 04, SER WILD 01
Dobrinich, Trevor	53052	SER REV 09
Doherty, Pat	91344	ACK 01
Doherty, Patrick	31721	SER WILD 08
Doiron, Sherri	51339	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Dominguez, Rodrigo	51474	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Donaldson, Patrick	43923	P&N 02, SER REV 09
Donna, Jensen	37390	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Donofrio, Mac	51040	ACK 01
Donovan, Stephan	32527, 44357	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01

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Doren, Robert	53332	SER WILD 01
Dorer, Jeff	44227	ACK 01
Dotcheva, Ana	50997	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Drake, Michael	51727	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Dressel, Gail	52350	BIO BIO 01
Dreyer, H.B. (Gunderboom)	51758	SER H&S 02
Dryden, William	32290, 44026	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Duarte, Jalaya	62868	P&N 14, SER H&S 04
Duarte, Jason	62869	P&N 08, P&N 14, SER H&S 04, SER REV 08, SER SUB 07
Ducoff Garber, Sandra	51158	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Duda, Dorothy	31659	ACK 01
Dudrick, Roseann	52517	SER REV 09
Dunaway, Dan	31758	ACK 01, BIO VEG 05, BIO WILD 03, MIT 05, P&N 08, PAA 14, SER LAND 07, SER REV 11
Dunn, Art	33128	MIT 15, SER H&S 01, SER ROAD 05
Dunn, Elmo	53086	SER WILD 02
Dunn, Kathy	32549, 51199	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Durnell, Tim	51909	BIO BIO 01, P&N 06
Dushkin, Joseph	52025	P&N 08
Dutch, P.	31695, 51572	ACK 01
Dutcher, Linda	96451	ACK 01
Dutschke, Stephen	51395	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Duval, Robert	51250	ACK 01
Dye, C	81674	ACK 01
Eadie, Sally	51406	ACK 01, BIO BIO 01, SER REV 09
Eardley, Bradley	51584	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Ebershoff-Coles, Susan	53127	SER REV 04
Ebersold, Deborah	51501	BIO BIO 01
Edelson, Jim	51477	SER WILD 02
Edwards, Carol	44077	BIO BIO 01, P&N 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Edwards, Denise	50995	SER WILD 01

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Egeli, Carolyn	51329	ACK 01
Eggleston, Patrick	37367	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04
Eisenhart, Brenda	44060	BIO BIO 01, P&N 05, SER LAND 01, SER REV 04, SER WILD 01
Eisenmann, Julie	51097	ACK 01
Elena Morey, Luz	51747	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04
Elfin, David	44177	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Elkind, Linda	53257	BIO BIO 01, BIO VEG 01
Ellingham, Lewis	37369	ACK 01
Elliott, Benton	51722	SER WILD 02
Elliott, Phyllis	51209	SER WILD 09
Ellis, Robert	102432	ACK 01
Elton, Wally	51774	BIO BIO 01, SER LAND 01, SER REV 01, SER WILD 01
Eme, Jota	51287	SER WILD 01
Enerson, Hal	51488	P&N 01, REG 02, SER REV 09, SER WILD 01
English, kim	32893, 51718	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Enz Lill, Nancy	51507	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Epailly, Guillemette	52107	PHY AQ 02
Erickson, Jonathan	37387	BIO BIO 01, BIO WILD 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Erik, Elam,	51922	P&N 03, SER H&S 02
Eskelin, Karen	35188, 44155	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Essenpreis, Lisa	51511	ACK 01
Estes, Douglas	51208	SER WILD 01
Etherton, S	44144	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Etherton, Stephanie	51405	SER WILD 02
Evans, Dinda	44237, 45432	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Evenson, Marilyn	31590, 51645	SER SUB 01, SER WILD 02
Fabing, Keith	51304	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Faegre, Dirk	31696, 32895	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 08
False Pass and Nelson Lagoon, Public Meeting	52023	BIO WILD 01, IAM 01, SER WILD 10

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Farell, Bart	34076, 51693	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01, SER WILD 08
Farin, Larry	51899	ACK 01
Farina, John	51161	P&N 06, SER WILD 01
Faris, Carol W	78690	ACK 01
Farley, Lin	51178	ACK 01
Fast, Wendy and Frances Smith	51195	PAA 21
Fein, Ethan	51563	ACK 01
Feingold, Pauline	53157	PHY AQ 01
Feingold, Sue	51048	P&N 06, SER LAND 01, SER WILD 01
Felstiner, John	32494, 44353	ACK 01, BIO BIO 01, REG 03, SER WILD 01
Feltman, Corki	44146	ACK 01
Fenster, Steven	31691, 31857	BIO BIO 01, REG 03, SER WILD 01
Feran, Michael	35721, 51354	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Ferm, Mary	31651	BIO VEG 01, BIO WILD 01, PHY CON 04, PHY HYD 03
Fickling, Karl	31982, 43983	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Fiedler, David	53031	SER WILD 02
Field, Francis	51902	BIO BIO 01, P&N 01, P&N 06, SER REV 09, SER WILD 01
Field, James T.	43972	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Fields, Mary	43954	ACK 01
Fifer, Nancy	51396	ACK 01
Figuroa, Benjamin	43970	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Fine, Jonathan	51914	SER WILD 02
Finman, Sigmund	44200	ACK 01
Fiorini, Mark	51136	ACK 01
Fischer, Roz	51881	ACK 01
Fischman, Lawrence	51489	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Fish, Jason	51434	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Fischer, Courtney C	51540	BIO WILD 01, SER LAND 01, SER WILD 09
Fitzgerald, Kim	31759	BIO BIO 01, P&N 01, SER REV 04
FitzGerald, Lisa	51009	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Flanagan, Lynn	44101	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Fleener Sr, William	51535	ACK 01

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Flick, Wayne	31661	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Flint, Paul	51896	PAA 02, PAA 10, PAA 17, SER H&S 03
Fogg, Margaret	51402	P&N 11, SER WILD 09
Follett, Thelma	78837	ACK 01
Ford, Kathy	31646	SER WILD 09
Ford, Marge	51039	P&N 08
Forester, Georgina	51377	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Fosburgh, Eric	51968	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Foster, Claudia	51314	SER WILD 01
Foster, Leah	44244	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Fouche, David	43991	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Fowler, Leslie	51102	ACK 01
Fowler, Roanld (Blue Goose Alliance)	31763	PAA 03, PAA 26, REG 08
Fowler, Roanld (Blue Goose Alliance)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Fox, Sandra	44093	BIO BIO 01
Fraley, Lawrence E	51675	SER WILD 09
Frame, George	51777	BIO BIO 02, BIO VEG 05, P&N 05, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Franchi, Irena	51169	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Frasche, Robey	51196	ACK 01
Fraze, Roy	51261	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Frazier, Max	44174	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Freeman, Helena	44094	ACK 01
Freudlich, Grace	51249	ACK 01
Friend, Doug	72783	ACK 01
Friends of Alaska National Wildlife Refuges (Raskin, David)	31763	PAA 03, PAA 26, REG 08
Friends of Alaska National Wildlife Refuges (Raskin, David)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Fritsch, Robert	51618	ACK 01
Frost, Stephen	51036	ACK 01
Fugate, Peggy	51338	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Futrell, Sherrill	44125	BIO BIO 01, SER REV 04, SER WILD 01
Futterer, Joe	44273	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gaffney, Pat	51363	ACK 01, SER LAND 01, SER WILD 01
Galanti, Janet	51456	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Gale, Karen	51749	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gallaher, Susan	44128	ACK 01
Garber, Mark	43922	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Garbrick, Kathe	44296	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Garcia, Haydee	51071	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gardiner, Trish	44290	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01

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Gardner, Annah	51664	BIO BIO 01, SER LAND 01, SER WILD 01, SER WILD 08
Garitty, Michael	44223	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Garlena, Sharon	51083	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Garth, Ann	52012	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Gay, Ilse	71506	ACK 01
Geerlings, Sonia	51880	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Geiss, Geoff	51681	BIO BIO 01, P&N 06
Genin, Merideth	51485	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gennaro, Gina	51064	P&N 06, SER REV 04
Gentry, Don	51189	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
George, Geoff	51021	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
German, Dennis	31725	ACK 01
German, Dennis	51371	SER WILD 01
Getter, Camile	49096, 51602	BIO BIO 01, BIO WILD 01, P&N 06, SER REV 09, SER WILD 01
Gibson, Bruce	31637, 51081	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Giese, John	51122	SER WILD 08
Gignac, David	41175, 51537	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Gilbertson, David	36728, 51525	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Giller, Tim	51904	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gilliland, Ronald	51952	ACK 01
Gillingham, Carol	44142	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gillono, Mark	44346	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gindele, Abigail	44271	BIO BIO 01
Gingold, Lina	51352	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gionet-Hawker, Celeste	35032, 51710	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01, SER WILD 02
Glass, Frank	72916	ACK 01

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Glaston, Joe	51449	SER WILD 01
Gliva, Steve	44292	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Glosecki, Dylan	44224	ACK 01
Goddard, John	44265	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Goettelmann, Margaret	52302	REG 03
Goldberg, Marshall	51080	BIO BIO 01
Goldberg, Michael & Melissa	51185	BIO BIO 01, P&N 06, SER WILD 01
Goldman, Mark	51738	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Goot, Yvette	51661	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gordon, Jeffery A. (American Birding Association)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Gore, Anne	53322	BIO BIO 01, SER REV 09
Gorham, Judy	44166	BIO BIO 01
Gould Mack, Gary	62870	P&N 08, P&N 14, SER H&S 04
Gould, Ashten	62871	ACK 01

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Gould, Dale (Agdaagux Tribe of King Cove)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Gould, Dale (Agdaagux Tribal Council)	52030	HIST 07, SER H&S 01

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Gould, Dean (King Cove Corporation)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Gould, Dean (King Cove Corporation)	52041	HIST 03, SER H&S 04, SER WILD 10
Gould, Nicole	62872	SER H&S 02, SER H&S 04
Gould, Rea	62873	ACK 01
Gould, Steve	51683	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Graf, Sandy	51294	P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Graff, Steve	44113	BIO BIO 04, PAA 13, SER H&S 04

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Gramstedt, Al	31636	ACK 01
Grant, Linda	44334	ACK 01
Graver, Chuck	37392	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Graves, Caryn	36525, 36650, 44274	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Gray, Lynn	50993	ACK 01
Gray, Pamela	51608	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Green, Meredith	39073, 44312	BIO BIO 01, P&N 02, P&N 06, SER LAND 01, SER REV 09, SER WILD 01
Green, Simcha	52187	P&N 02, SER REV 09
Greenboam, Bob	37389	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Greenwall, Theresina	51029	PHY CON 04
Greenway, Mary Lorna	52158	PHY AQ 01
Greer, Ed	37407	ACK 01
Gregorio, Barbara	44091	ACK 01
Gregory, Probyn	51478	SER LAND 01, SER REV 04, SER WILD 01
Griffith, Nancy	51092	REG 03
Griffith, Rosemary	51436	SER WILD 02
Griffith, Vern	44130	ACK 01
Grimaud, Pamela	51639	SER WILD 01
Grimes, Nancy	39723, 51913	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01, SER WILD 02
Grone, Lori	51912	ACK 01
Gross, Marc	50988	ACK 01
Groth, Kathy	31726, 44324	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Grove, Paul	31652, 51890	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Grover, Ravi	51336	BIO BIO 01, SER H&S 03, SER REV 09
Gruber, Kathy	97905	ACK 01
Gruzebeck, Terry	51430	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gunderboom (Dreyer, H B)	51758	SER H&S 02
Gundersen, Elijah Jaden	62874	P&N 08, P&N 14, SER H&S 04
Gundrum, Steven	44147	ACK 01
Gunther, Ken	44095, 47961	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Gustafson, Jon	43940	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Guthrie, Linda	53342	SER REV 09, SER WILD 08
Guzzi, Ted	51676	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Gwin, Tom	32097, 44109	ACK 01, BIO BIO 01, REG 03, SER WILD 01
Gwyn, Steven	40126, 51198	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Hinkle, Janice	51085	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
H., Paulele	44141	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Haas, Margaret	44308	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Haber, Kat	51711	ACK 01
Haber, Kat	53046	SER REV 04
Hafner, Amanda	44065	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hager, Jon	51499	ACK 01
Hagerty, MC	51627	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hahn, Nikki	44063	BIO WILD 01
Hall, Holly	51101	BIO BIO 01, P&N 02
Hallett, Mark	51031	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hammer, Randy	31632	ACK 01
Handelsman, Robert	44270	ACK 01
Handwerker, Dr.Steven E	44206	ACK 01
Hanna, Catherine	51834	ACK 01
Hanna, Helen	43973	SER REV 04
Hannah, Jim	33117	BIO BIO 01, BIO WILD 19, SER H&S 05, SER REV 03
Hannam, Angie	51448	PHY AQ 01
Hanneken, Donna K	44231	BIO BIO 01
Hansen, Hannah	43977	ACK 01
Hardy, Ingrid	44176	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Harker, Jana	43920	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Harman, Chris	37412	ACK 01
Harris, Debra	51610	SER WILD 01
Harrison, Jerome	66600	ACK 01
Hart, Jennifer	51399	P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 09

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Harte, Mary	43019, 51133	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Hartman, Lois	31748	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hartzler, Margaret	51636	ACK 01
Harvey, Mark & Judy	51678	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hasapidis, George	31657, 51221	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hassin, Laura	51227	BIO BIO 01, SER WILD 01
Hathaway, Susan	44148	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Haugen, Valerie	44233	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hawley, Daniel	65938	ACK 01
Hawxhurst, Amelie	31686	SER WILD 01
Hazlett, yYriko	51575	ACK 01
Healy, Jerome	81953	ACK 01
Heaton, Timothy	44160	REG 03
Hebron, Theresa	51128	ACK 01
Heckman, Wayne	52372	REG 03
Hed, Scott	37357	P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Helmer, Kathleen	33169, 44173	BIO BIO 01, P&N 06, SER REV 04, SER REV 09, SER WILD 01
Hendershott, Carmen	51241	BIO BIO 01, REG 02, SER REV 09
Henderson, Colin	31597	REG 03
Henderson, Maureen	50991	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 09
Hendricksen, Barbara	51764	SER EJ 03, SER LAND 06
Hennen, Heide	49801, 51546	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Hennigh, Gary	51965, 51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO

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		WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 05, DATA 17, DATA 23, DATA 26, DATA 27, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 12, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 12, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 05, SER SER 06, SER SER 07, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Hensey, Chandira	43967	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Henzi, Bernadette M	51734	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hernandez, Adrienne	51318	BIO BIO 01, SER WILD 09
Hernandez, Eloy	44272	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Herndon, Royce	51656	ACK 01
Herr, Dennis	51357	SER WILD 01
Herrington, Marna	51267	P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hertz, L	44061	SER REV 04, SER WILD 01, SER WILD 02
Heuker Bros, Inc (Heuker, Tim)	52044	P&N 06, SER H&S 04, SER LAND 06, SER REV 08
Heyneman, John P	44180	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hiatt, Ettus	51141	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Hiestand, Carrie	44120	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hill, Larry	40209, 43916	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Hill, Maria	44036	ACK 01, SER REV 04, SER WILD 01
Hillman, Lynn	31688	ACK 01
Hillstrand, Nancy	51977, 51989	BIO BIO 01, BIO WET 01, BIO WILD 01, P&N 01, P&N 11, PAA 18, SER REV 09, SER WILD 02
Hilton-Sawyer, Anne	51342	SER WILD 01
Hinterthuer, Howard	51404	ACK 01, REG 03
Hirsche, Evan (National Wildlife Refuge Associaiton)	31763	PAA 03, PAA 26, REG 08
Hirsche, Evan (National Wildlife Refuge Associaiton)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Hirth, Carol	51731	ACK 01
Hissam, Tim	51114	P&N 06, SER REV 04, SER WILD 01, SER WILD 02
Hissom, Jill	37401	ACK 01
Hitt, Dan	44132	ACK 01, BIO WILD 05, PAA 16, SER WILD 09
Hlavaty, Doreen	51981	SER REV 04, SER WILD 01
Hoaglund, Judy	51135	BIO BIO 01, SER WILD 01
Hobbins, Weldon	51590	ACK 01
Hochendoner, Bernie	51296	ACK 01
Hochheiser, Harry	41612, 43994	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Hockett, Mary	43971	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Hodes, Harold	44199	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hodges, Elizabeth	44354	ACK 01
Hodie, Mark	31675	BIO WILD 01
Hoffman, Curtis and Jane	51736	BIO BIO 01, SER REV 09
Hoffman, Steve	43969, 45576	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01, SER WILD 09
Hogan, Sheryl	51259	SER WILD 01
Hogben, Jack	44131	SER WILD 08
Holahan, Thomas	51437	ACK 01
Hollon, Hollie	51662	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Holmes, Patrick	52027	BIO FISH 01, BIO FISH 02, BIO WILD 02, BIO WILD 05, HIST 06, P&N 13, SER EJ 01, SER H&S 04, SER LAND 06, SER ROAD 05
Holt, Howard	81926	ACK 01
Holtam, Jordan	51687	SER WILD 08
Holtz, Barbara	51134	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Holtzclaw, T C	92288	ACK 01
Honsa, Wiliam	51447	ACK 01
Hooley, Merle	51103	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hoover, Vicky	50996	BIO BIO 01, BIO WET 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER ROAD 01, SER WILD 01
Hopgood, Mary Anne	51274	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hoppenbrouwers, Elke	53072	BIO BIO 01, SER REV 04
Horwitz, Martin	36098, 51331	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Howard, Jean	52005	BIO BIO 01, REG 03, SER LAND 01, SER REV 04, SER WILD 02
Howard, Sandy	51438	SER REV 04, SER WILD 01
Howe, Duane	31766	BIO BIO 05, P&N 01, PAA 24, SER LAND 04, SER ROAD 01, SER WILD 01
Hoyer, Eric	31672, 33025, 45843, 51550	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Hrabe, Patricia	51775	SER LAND 01, SER REV 04, SER WILD 01
Huey, Terry	44331	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hughes, Aileen	51867	ACK 01
Hughes, James	31694	ACK 01

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Hughes, Kevin	32738, 51696	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Hughes, Sarah	43964	ACK 01
Hulett, Lisa	31634, 51210	SER WILD 08, SER WILD 09
Hult, Philip	53089	BIO BIO 02, SER REV 09
Hunt, Obie	51061	ACK 01
Hunt, Rich	37404	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hurley, Gaylene	51108	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Hurschik, Kim	51420	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Huser, Verne	31653, 34722	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Hutcherson, Nori	51885	ACK 01
Hyde, Mary	90038	ACK 01
Ikenberry, Nelda	43988	BIO BIO 01
Imam, Bassam	31681	BIO BIO 01
Impulse Media Services LLC (Miner, James)	51007	P&N 01
Isbell, Linda	31606	BIO WET 01, P&N 02, SER LAND 01, SER REV 04, SER SER 03, SER WILD 08
Jackson, R. S	31596	SER WILD 08
Jacob, Jill	51200	SER WILD 08
Jacobs, Quida	51311	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jacobson, Don	43909	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jacobus, Paul	51468	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jacques, Karen	51589	BIO BIO 01
Jacuk, Sharon	51069	ACK 01
Jaegers, Martha	51254	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jaffe, Allison	43943	ACK 01
Jaffee, Leonard	43947	ACK 01
James, Nancy	51628	SER WILD 01
Jannink, Jean-Luc	51974	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 02
Jansen, Mary	51804	BIO BIO 01
Jeffery, Patricia	44256	BIO BIO 01
Jeffrey, James	51380	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Jeffries, Lynne	41108, 51703	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01, SER WILD 02
Jenkins, David (ConservAmerica)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Jenks, Robert	44022	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jessler, Darynne	36394, 36395, 37420	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Jessup, Nicole	44153	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jhangiani, Kares	51197	ACK 01
Jo Heyneman, Amy	44249	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Joan Patterson, Carol	51831	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jockeyly, Don	37377	ACK 01
Johnson, Diane	43945	SER WILD 01
Johnson, Dwight	51592	SER WILD 01
Johnson, Joseph	51571	SER WILD 02
Johnson, Mark	51464	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Johnston, Ken	62906	ACK 01
Jones, B T	51389	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jones, Clayton	44110	ACK 01
Jones, Connie	51223	ACK 01
Jones, Don and Jane	44234	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jones, Donna	51878	HIST 03, P&N 03, SER EJ 01, SER H&S 04, SER LAND 06, SER ROAD 04

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Jones, Eric	44254	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jones, Jay	51682	SER REV 02, SER WILD 02
Jones, Kitty	103610	BIO BIO 01, SER REV 09, SER WILD 01
Jones, Nora	50994	ACK 01
Joos, Sandy	31722	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Josephson, Cliff	53076	REG 02
Joyce, Doria,	44069	SER LAND 01, SER REV 04
Judelman, Jonathan	51453	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Jusinski, Bernadette	52068	REG 03
Justice, Faith	51057	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kaiser, Robert	51353	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kaiwi, Jean	44031	BIO BIO 01, SER WILD 01
Kampwirth, Gregory P	51971	ACK 01
Kaneko, Sylvia	51237	ACK 01
Kanzer, Michaelain	44099	ACK 01
Kaohelaulii, Annette	51740	P&N 02, SER WILD 02
Kaplan, Joan	51348	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01
Karanjawala, Eric	44260	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kasdan, Maxann	38031, 51663	BIO BIO 01, P&N 06, SER REV 03, SER REV 09, SER WILD 01
Kastel, Diane	52963	BIO BIO 02, SER WILD 01
Katz, Kathleen	52262	REG 03
Katzbeck, Nancy	51887	P&N 02
Kavruck, Deborah	44055	SER WILD 01
Kawazoe, Kathryn	31615	BIO VEG 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kazyak, Paul	37431	ACK 01
Kdanowski, Godfree	51459	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kealy, Jim	44307	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01
Keeler, Susan	44163	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04
Keenan, Elizabeth	43934	ACK 01
Kegler, Lori	37363	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02

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Keim, Frank	33115	P&N 06, SER REV 04, SER WILD 01
Keiser, Robert	44298	SER WILD 01
Kellermann, Tommie	51012	BIO BIO 02
Kelley, Jennifer	51140	ACK 01
Kelley, MaryLu	51622	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kelly, Ann	51172	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kelts, Shari	53035	BIO BIO 01
Kemenesi, Rick	44326	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kemmerer, Jan	31735	ACK 01
Kemmerling, Kathleen	77586	ACK 01
Kemper, Katie	44032	ACK 01
Kendall, Vaughan	51372	REG 03
Kenezuroff, Leff (Belkofski Tribal Council)	52033	ACK 01, HIST 04, SER H&S 04
Kennedy, Kate	44119, 48756	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Kenney, Charlene	51063	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kennie, Julie	51214	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kerasavich, Mary	95915	ACK 01
Kerstein, Steven	51673	SER REV 09
Kessler, Marjorie	44356	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kestler, Carol S	51276	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kielman, Laura	51882	BIO BIO 01
Kinder, Dianne	31627	ACK 01
King Cove Corporation (Gould, Dean)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46,

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		COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
King Cove Corporation (Gould, Dean)	52041	HIST 03, SER H&S 04, SER WILD 10
King Cove, Public Meeting	52042	BIO VEG 06, BIO WILD 03, DATA 21, DATA 27, HIST 01, HIST 04, HIST 07, IAM 01, MIT 06, MIT 08, MIT 12, PAA 04, PAA 05, PUB 02, REG 12, REG 14, REG 23, REG 24, SER CUL 01, SER CUL 02, SER CUL 03, SER H&S 02, SER H&S 04, SER H&S 07, SER LAND 01, SER REV 07, SER REV 08, SER REV 11, SER ROAD 08, SER ROAD 14, SER SER 05
King, Jean	43961, 49297	BIO BIO 01, BIO WILD 01, P&N 06, SER REV 09, SER WILD 01
King, Sue	51462	SER WILD 01
Kionka, Christina	31717	SER WILD 02
Kipling, Caroline	31666, 44085	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER ROAD 01, SER WILD 01
Kirks Junior, James	51482	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kirkwood, Karen	51897	ACK 01
Klausing, Michael	44247	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Klerer, Leona	44279	ACK 01

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Klipfel II, George F	44213	REG 03
Klubek, Brian	36125, 44075	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Knox, Shannon	44243	ACK 01
Kochuten, Nadine	50998	P&N 03, SER CUL 01, SER H&S 04
Koenig, James	51028	ACK 01
Kohn, Deborah	51723	ACK 01
Koogler, Sharon	44314	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Kosar, Darlene	44126	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Koso, Dante	62875	SER H&S 04
Kostis, Steven	37402, 51317	ACK 01
Kovalicky, Tom	31709, 44250	ACK 01, P&N 06, SER LAND 01
Kozie, Karin	44302	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Krabbenhof, Bonnie	44197	SER WILD 01, SER WILD 02
Kraft, Victoria	51364	ACK 01
Kramer, Laura	38675, 51303	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Kramer-Dodd, Gay	37398, 43721	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Krause, Susan	51042	ACK 01
Krikorian, Linn	51625	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Krimm, Dorothy	51923	ACK 01
Krueger, Jon	32875, 51285	ACK 01, BIO BIO 01, REG 03, SER WILD 01
Krueger, Shari	51033	ACK 01
Kruse, Jack	51624	ACK 01
Kuczwanski, Linda	51030	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04
Kuffler, Suzanne	44182, 50600	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01, SER WILD 09
Kukkonen, Holly	51950	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Kurtz, Maya	51576	SER WILD 02
Kusakin, Raietta	62876	SER H&S 04

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Kuzakin, Simeon (Belkofski Tribal Council)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Kuzakin, Simeon (Belkofski Tribal Council)	52035	ACK 01, HIST 04, P&N 08, REG 24, SER CUL 02, SER H&S 04
Kuzia, Jennifer	80073	ACK 01
Kyler, Joan	44286	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Labadie, Kevin P	43946	BIO BIO 02, SER WILD 08
Lackey, Mercedes	31701, 51533	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Lagadinos, Christie	44045	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Lambeth, Larry	53040	BIO BIO 02
Lamon, Adda	51840	P&N 06, SER LAND 01
Landau, Doug	31716, 43928	P&N 01, SER WILD 01
Lane, Carson	51401	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lane, Judy	51328	SER WILD 01
Lange, Marlena	33052, 35381, 51502	BIO BIO 01, P&N 06, REG 03, SER REV 09, SER SER 04, SER WILD 01, SER WILD 02, SER WILD 09
Lann-Clark, Erica	51224	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lanskey, Marcus	31614, 35257	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Lantz, Jamie	51041	SER WILD 09
Larsen, Dylan	62877	P&N 08, SER H&S 04, SER H&S 06, SER LAND 08, SER REV 08
Larsen, Levi	62878	HIST 03, SER LAND 06, SER REV 11, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER SUB 07
Larson, Gary & Melody	44269	P&N 02
Larson, Karla	44167	SER WILD 01
LaRue, Jesse F	51568	ACK 01, SER WILD 02
Law, Leslie	52440	SER WILD 08
Lawrence, Rhett	45433, 51815	BIO BIO 01, P&N 01, P&N 02, P&N 06, REG 02, SER REV 09, SER WILD 01
Lawson, Douglas	51597	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Lawson, Marita	51391	ACK 01
Laybourn, Jim	51647	SER WILD 02
Layton, Jean	31690	ACK 01
Lazell, James	31710	ACK 01
Le Roux, Philip	36212, 44198	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01

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League of Conservation Voters (Sittenfeld, Tiernan)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Leaper, Sandra	53293	BIO BIO 01
Leaphart, Stanley	51985	BIO WILD 19, BIO WILD 22, IAM 04, P&N 08, SER H&S 04, SER LAND 06, SER WILD 10
Leavenworth, William	53156	SER REV 04
Leda, Marian	51326	SER WILD 08
Lee Kohler, William	51487	ACK 01
Lee Laplante Sharron	51733	ACK 01
Lee, Jinny	51091	ACK 01
Lee, Kathleen	39372, 44218	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Lehman, Cynthia	51286	BIO BIO 01
Lehrer-Graiwer, Sarah	51739	BIO BIO 01, MIT 16, P&N 06, SER LAND 01, SER WILD 01
Leitch, Maryann	43989	SER WILD 01
Lemoine, Kathryn K.	37400	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Lenhart, Donna	53056	SER REV 09
Lenz, Nick	43990	SER WILD 01
Leonowitz, Frank	44027	ACK 01
Lerner, Kenneth	43930	ACK 01
Lerner, Rebecca	51745	ACK 01
Lesley, Dawn	51497	SER WILD 01
Levin, David	51551	ACK 01
Levine, Beth	51212	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lewis, Sherry	51967	P&N 06, PAA 15, SER REV 09, SER WILD 01, SER WILD 02

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Lewis, Tanna	51767	P&N 03, SER H&S 04
Lightcap, Norma	51480	ACK 01
Lilling, Glenda	52379	BIO WILD 01
Lind, Ella	62879	SER H&S 04
Linda L, Carroll,	51697	SER WILD 01
Lindau, Rebecka	51112	ACK 01
Lindner, Jan	51689	ACK 01
Lindner, Joyce	43938	P&N 06, SER WILD 01
Lindsey, Janine	51026	SER WILD 09
Lindsley, Joseph	51240	ACK 01
Lish, Chris	51893	P&N 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Liske, Patricia	31702	ACK 01, BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Liskovec, Jim	37384	SER WILD 01
Little, Christina	51811	ACK 01
Livingston, James	31724	SER WILD 09
Livingston, Jim	44013, 44025	BIO BIO 01, BIO T&E 03, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lo, Ruth	51129	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Logan, Scott	31667, 44358	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Logan, Todd	33116	ACK 01, BIO BIO 01, P&N 06, P&N 09, P&N 10, PAA 26, REG 05, REG 17, REG 28, SER H&S 03
Logsdon, Jimi	51557	SER WILD 01
Loiselle, Dave	51160	SER WILD 01
Long, Carol	51674	REG 03, SER WILD 01
Long, Geoff	51087	SER WILD 01
Longenecker, Pam	44008	ACK 01, BIO BIO 01, BIO WILD 01, P&N 06, SER REV 04, SER WILD 01
Longengaugh, Dee	53228	SER REV 01
Lopez, Josephine	51113	BIO BIO 01, P&N 01, P&N 06, SER REV 09, SER WILD 01
Lorig, Connie	44350	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lovelace, Marcia	44236	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Loveland, John	51891	ACK 01
Loveland, Michael	51090	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lubin, Jan	43949	BIO BIO 01, SER H&S 03, SER LAND 01

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Lubov, Ricki	44057, 51008	SER WILD 01, SER WILD 08
Lucas, Mary	44252	ACK 01
Luckham, David	51162	SER WILD 01
Lupowitz, Marty	51443	BIO BIO 01, SER WILD 01
Lurie, Eve	44246	P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lusciatti, Tammy	51638	SER REV 04, SER WILD 01
Luther, Doris S	51373	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lyke, Linda	50992	SER WILD 01
Lyman, Mike	51755	ACK 01
Lynch, Cindy	51330	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lynch-Bobbitt, Tammy	51611	SER WILD 09
Lyon, Marsha	51297	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Lyons, Dawn	52022	BIO WILD 01, PAA 23, SER H&S 03, SER ROAD 11
M., Jamie	90490	ACK 01
M., Suzanne	51567	ACK 01
Mabary, Brian	53099	BIO BIO 01, SER REV 04
Mac Nish, Robert	37427	P&N 06, SER REV 04, SER WILD 01
Macdonald, Angus M	44316	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mace, Pat	44098	ACK 01
Mack, Candace	62881	P&N 03, P&N 08, SER H&S 04
Mack, Devan	62882	P&N 03, P&N 08, SER H&S 02, SER H&S 07, SER ROAD 14
Mack, Edward	51796	SER H&S 04
Mack, Elaina	62883	P&N 14, SER H&S 04
Mack, Henry (City of King Cove Mayor)	51918	HIST 01, P&N 03, P&N 08, PAA 12, SER EJ 01, SER LAND 11
Mack, Henry (City of King Cove Mayor)	51918	HIST 01, P&N 03, P&N 08, PAA 12, SER EJ 01, SER LAND 11
Mack, Henry (City of King Cove)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO

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		WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04, G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
Mack, Jersey	62884	ACK 01
Mack, Jr., Joseph	62880	ACK 01
Mack, Memphis	62885	ACK 01
Mack, Stanley (Aleutians East Borough)	51978	ACK 01, BIO BIO 01, BIO FISH 02, BIO FISH 03, BIO FISH 06, BIO T&E 01, BIO T&E 02, BIO T&E 04, BIO T&E 05, BIO VEG 04, BIO WET 05, BIO WET 06, BIO WET 09, BIO WET 10, BIO WILD 05, BIO WILD 11, BIO WILD 12, BIO WILD 13, BIO WILD 14, BIO WILD 15, BIO WILD 16, BIO WILD 17, BIO WILD 18, BIO WILD 19, BIO WILD 23, BIO WILD 24, BIO WILD 25, BIO WILD 26, BIO WILD 28, BIO WILD 29, BIO WILD 30, BIO WILD 31, BIO WILD 32, BIO WILD 34, BIO WILD 35, BIO WILD 36, BIO WILD 37, BIO WILD 38, BIO WILD 39, BIO WILD 40, BIO WILD 41, BIO WILD 42, BIO WILD 43, BIO WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 17, DATA 23, DATA 26, EDI 01, EDI 02, EDI 03, EDI 04,

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		G2G 01, G2G 02, HIST 01, HIST 06, HIST 08, IAM 02, IAM 04, IAM 05, IAM 06, IAM 07, IAM 08, IAM 09, IAM 10, IAM 11, MIT 02, MIT 03, MIT 04, MIT 11, MIT 12, MIT 13, MIT 14, P&N 03, P&N 08, P&N 09, P&N 12, PAA 07, PAA 10, PAA 11, PAA 13, PAA 14, PAA 22, PHY AQ 01, PHY AQ 03, PHY CON 01, PHY CON 06, PHY HYD 01, PHY HYD 04, PHY HYD 07, PHY PHY 01, PHY PHY 05, PHY PHY 06, REG 14, REG 15, REG 16, SER ARC 01, SER ARC 02, SER CUL 04, SER CUL 05, SER H&S 02, SER LAND 01, SER LAND 05, SER LAND 06, SER LAND 08, SER LAND 11, SER LAND 13, SER LAND 14, SER LAND 15, SER LAND 16, SER LAND 19, SER LAND 20, SER LAND 22, SER REV 01, SER REV 05, SER ROAD 13, SER ROAD 14, SER ROAD 15, SER ROAD 16, SER ROAD 17, SER ROAD 18, SER ROAD 19, SER ROAD 20, SER ROAD 21, SER ROAD 22, SER ROAD 23, SER ROAD 25, SER ROAD 32, SER SER 02, SER SER 08, SER SER 09, SER SUB 01, SER SUB 03, SER SUB 04, SER SUB 05, SER WILD 06, SER WILD 07, SER WILD 11
MacKay, Leslie	51503	BIO BIO 01, P&N 06, SER LAND 01, SER WILD 02
MacKay, Ulrike	44105	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mackey, Claudia	37372	BIO BIO 01, SER LAND 01, SER REV 04
MacKinnon, Genevieve	51599	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01
MacNeil, Kay	53331	BIO WILD 01
MacPherson, Bob	51054	ACK 01
Maddalena, Cinzia	44267	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Madden, Don E	51322	SER WILD 08
Magnin, Didi	51327	REG 03
Maher, Linda	51032	BIO BIO 02, P&N 06, SER WILD 01, SER WILD 02
Mahrt, Jack	53073	BIO WILD 01
Mains, Phyllis	51084	P&N 06, P&N 11, PAA 02, REG 01, SER REV 09, SER WILD 09
Mainwaring, Edward	44107	SER WILD 09
Majors, Shirley	53268	SER WILD 09
Malarney, Holly F	52317	P&N 11
Malina, Matthew	44135	ACK 01

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Mallika, Henry	37429	BIO BIO 01, P&N 06, SER LAND 01, SER WILD 01
Maloney-Brown, Patricia	51418	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mandell-Rice, Bonnie	51786	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mang, J D	51685	SER WILD 01
Mann, Barbara	44217	ACK 01
Mannchen, Brandt	43953	P&N 06, SER LAND 01, SER REV 04, SER WILD 08
Manzer, Dennis	51171	ACK 01
Marc, David	44070	ACK 01
Marco, Stephanie	44337	SER WILD 01
Marcus, Syd	51256	SER WILD 01
Marie Fetch, Elena	51403	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Marin, Dick	51149	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Marin, M	51165	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Markowitz, John C	51591	ACK 01
Maron-Friend, Judith	43993	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Marrs, Carl (Old Harbor Native Corporation)	51759	P&N 13, SER H&S 02, SER H&S 04, SER LAND 06
Marschner, Jamie	43992	BIO BIO 01, P&N 06, SER LAND 01, SER WILD 01
Marshall, Rick	44083	SER LAND 01, SER WILD 01
Martin, Brad	52918	P&N 11, SER REV 04
Martin, Drew	51651	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Martin, Drew	31699, 46430, 51983	BIO BIO 01, P&N 01, P&N 02, P&N 06, REG 02, SER REV 09, SER WILD 01
Mastracchio, Giovanni	37424	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Matilda, Essig	37358	SER LAND 01
Matinjussi, Valarie	51886	P&N 02
Matthews, Kathie	44168	ACK 01
Mattiello, Tricia	44024	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mauer, Fran	33114	REG 01
Mayer, Joe	44015	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mayo, Gail	31739	BIO BIO 01, P&N 01, SER WILD 09

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Mazik, Kim	51580	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mazzoni, Joseph	52038	P&N 06, REG 02, REG 05
McAleenan, Marian	51345	ACK 01
McArthur, Steve	51312	SER WILD 02
McCall, Chuck	51706	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
McCargo, David	52024	REG 22, SER LAND 04, SER LAND 18, SER REV 01, SER ROAD 26, SER WILD 02
Mccleary, Harriet	44082, 45793	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
McClure, Craig	31708	BIO WILD 01
McClurg, Daviann	44349	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
McCoy, Hazel	44335	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
McCrary, Richard	51694	ACK 01
McCulloch, Norma	49960, 51556	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
McDonald, Barbara	51282	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
McDonald, John (Ocean Run Seafood)	52037	ACK 01
McGill, Ann	51577	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01
McGillian, Micky	31719	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
McGinnis, Martha	44268	ACK 01
McGlashan, Rayette (Qagan Tayagungin Tribe)	52028	BIO WILD 29, SER CUL 03, SER H&S 04, SER REV 09
McGowan, Wendy	37428	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
McHenry, Ruth	52337	ACK 01
McKennon, Mark	31746	BIO WILD 01, P&N 01, SER REV 09
McLaughlin, Christopher	51379	BIO BIO 01, SER LAND 01, SER REV 09, SER WILD 01
Mclaughlin, Eric	32691, 43999	BIO BIO 01, REG 03, SER WILD 01, SER WILD 09
McLaughlin, Sigrid	31621	ACK 01, P&N 01, SER LAND 01, SER REV 01, SER WILD 01
McLean, Sarah	51843	P&N 06, SER LAND 01, SER REV 04, SER WILD 01
McMahon, Mary	43986	BIO BIO 01
McMurray, Karen	51226	REG 03, SER WILD 01

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McMurtry, Rian	52304	REG 03
McNamara, Karla	53063	BIO BIO 02
McNeley, Mark (Nelson Lagoon Tribal Council)	50986	BIO WILD 03, MIT 06, P&N 03, SER H&S 01
McNicholas, Tom	31738	SER LAND 03, SER ROAD 26, SER WILD 01
Mead, whitt	52046	SER REV 09
Medeiros, Patricia	43975	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 09
Meier, Joel	51387	SER WILD 01, SER WILD 02
Meisner, Lora	44123	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mellors, Colleen	52916	SER REV 09
Merkel, Alison	51800	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Merrill, Bill	44046	BIO BIO 01, SER WILD 01
Messino, Dina	51948	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Metz, Janice	51270	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Meuer, Rita	51475	ACK 01
Meyer, Christina	51366	ACK 01
Meyer, Karen	51522	BIO BIO 01, BIO WILD 01, SER LAND 01, SER REV 04
Mihalek, Jeannine	31654	SER WILD 01
Mikelson, Gay	51667	SER WILD 01
Miles, John	50990	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01, SER WILD 08
Miller, Ed	32873, 44007, 48356	BIO BIO 01, P&N 06, REG 03, SER REV 09, SER WILD 01
Miller, Fred	52153	SER REV 09
Miller, Jerre	52738	BIO BIO 01

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Miller, Kristen (Alaska Wilderness League)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Miller, Laura	51895	P&N 05, SER REV 09, SER WILD 01
Miller, Linda	51306	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Miller, Pamela (Northern Alaska Environmental Center)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Miller, Priscilla	52034	P&N 03, SER H&S 02
Mills, K	43962	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mills, Melva	43966	BIO BIO 01, SER REV 04, SER WILD 01, SER WILD 02
Miner, James (Impulse Media Services LLC)	51007	P&N 01
Miner, James (Moss Cape LLC)	51236	ACK 01
Mink, Dan	51164	SER WILD 01
Minn, Beverly	44294	ACK 01

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Mirich, Dee	81745	ACK 01
Mitchel, John	51509	P&N 02, SER LAND 01, SER REV 09, SER WILD 01
Mittig, Paul	51646	SER WILD 02
Mjos, Peter	52043	ACK 01, PAA 05, PAA 15, PAA 17, REG 01, SER H&S 03, SER H&S 08, SER REV 04, SER REV 08, SER ROAD 01
Mobeck, Ethan	62886	ACK 01
Moiseyev, Maya	51117	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Moller, Cecilia	51429	BIO BIO 01, SER LAND 01, SER WILD 01
Monroe, Gloria	51631	SER WILD 01
Montapert, Anthony	31714	ACK 01
Montapert, Anthony	44023	ACK 01
Montgomery, A	44054	BIO BIO 01, SER REV 04
Moody, Mark	51183	ACK 01
Mooney, Letitia	44018	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Moore, Mary E	44121	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Moorehead, Lisa	51708	BIO WILD 01, DATA 15, P&N 06, P&N 07, P&N 11, REG 03, SER LAND 01, SER ROAD 06, SER WILD 02
Moorhead, Ruth	65688	ACK 01
Moran, Hamilton	37396	SER WILD 09
Moretti, Vicente	51594	ACK 01
Morgan, Ed	44347	SER WILD 01
Morgan, Faith	51298	ACK 01
Morgan, Shannon (US Army Corps of Engineers)	31762	BIO WET 06, COOP 02, EDI 02, MIT 15, PAA 07, REG 07, SER REV 03
Morgan, Susan	51024	BIO BIO 01, P&N 06, REG 03, SER REV 04, SER WILD 01
Morris, David	52008	BIO WILD 03, PAA 22, SER H&S 04, SER LAND 06, SER ROAD 15
Morris, Gail	31740	ACK 01
Moss Cape LLC (Miner, James)	51236	ACK 01
Moss, Paul	31618	ACK 01, BIO VEG 01, P&N 06, SER REV 04, SER WILD 01
Mostov, Elizabeth	51719	P&N 02, SER REV 04
Motheral, Dorothy	43974	BIO BIO 01, P&N 06, SER WILD 02
Moyer, Ellen	51014	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Mugglestone, Lindsay	51457	ACK 01
Mulberry, Alice	44186	P&N 06, SER LAND 01, SER REV 09, SER WILD 02
Mulder, Joel	44776, 51712	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01, SER WILD 02
Munn, Donald	51341	SER WILD 01
Murkowski, Lisa (US Senate)	51763	BIO WILD 03, P&N 03, SER EJ 01, SER H&S 02, SER H&S 03, SER LAND 06
Murphy, William	44079	ACK 01
Mutch, Mary	31711	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mutch, Mary Louise	44235	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01
N, Kari	37359	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Nafziger, N	31610, 51175	BIO BIO 01, P&N 06, SER REV 04, SER SUB 01, SER WILD 01
Nagel, Herbert	51115	ACK 01
Nanson, Jade	62887	SER H&S 04, SER H&S 07, SER ROAD 15
Narbutovskih, Paula	99127	ACK 01
Nash, Jonathan	44359	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
National Wildlife Refuge Association (Hirsche, Evan)	31763	PAA 03, PAA 26, REG 08
National Wildlife Refuge Association (Hirsche, Evan)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Nedeau, James	51452	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Neff, Jan	51220, 51724	P&N 02, SER WILD 01
Neland, Mary	63988	ACK 01

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Nelligan, Amber	66531	ACK 01
Nelson Lagoon and False Pass, Public Meeting	52023	BIO WILD 01, IAM 01, SER WILD 10
Nelson Lagoon Tribal Council (McNeley, Mark)	50986	BIO WILD 03, MIT 06, P&N 03, SER H&S 01
Nelson, Ellen	51701	SER WILD 01, SER WILD 02
Nenon, Eloise	51795	ACK 01
Nesbit, Matt	44009	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Nesci, Loredana	51523	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Nestor-Roses, Joan	44351	ACK 01
Neuenschwander, Dwight	102746	ACK 01
Neuharth, Renee	31658	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 09
Neumann, Nancy	31752	ACK 01
Nevins, Laura	51367	SER WILD 01
Newbeck, Phyl	44127	BIO BIO 01, SER WILD 01
Newberry, Carla	52602	SER REV 09
Newcombe, Mae	44073	BIO BIO 01
Newell, Susan	51513	BIO BIO 02, P&N 01, SER REV 09, SER WILD 01
Newman, Connie	31745	BIO BIO 01, P&N 01, P&N 06, REG 02, SER LAND 01
Newman, Dustin	62888	HIST 01, HIST 03, IAM 01, REG 25, SER CUL 01, SER H&S 04, SER REV 10, SER ROAD 15
Newman, Jean	51010	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Newman, Madeline	62889	P&N 08
Newman, Sadie	62890	SER H&S 04
Nguyen, Khanh	51293	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Nichols, Emily	51879	SER WILD 02
Nicholson, Brandon	52836	BIO WILD 01
Nickas, George (Wilderness Watch)	31763	PAA 03, PAA 26, REG 08

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Nickas, George (Wilderness Watch)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Nickel, Lori	52941	SER REV 09
Nieland, Tom	43968	SER LAND 01, SER WILD 01
Nobles, William	44251	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Noblin, Rebecca (Center for Biological Diversity)	31761	ACK 01, BIO BIO 02, P&N 01, SER REV 04, SER ROAD 01, SER WILD 01
Noblin, Rebecca (Center for Biological Diversity)	31763	PAA 03, PAA 26, REG 08
Noblin, Rebecca (Center for Biological Diversity)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Noggle, Lucille	51900	SER REV 04, SER WILD 09

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Northern Alaska Environmental Center (Miller, Pamela)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Nowack, Kenneth	53107	SER REV 04
Nowak, Bruce L	44074	BIO BIO 01, P&N 06, SER REV 04
Noyes, Harry	67444	ACK 01
Nuesch, Raymond	44258	ACK 01
O. Hodges, Karen	43933	BIO BIO 01, P&N 06, SER LAND 01, SER WILD 09
O. Rose, John	43911	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Ocean Run Seafood (McDonald, John)	52037	ACK 01
O'Connell, Kathleen	52849	BIO BIO 02
Oda, John	51947	ACK 01
O'Donnell, Anne	83635	ACK 01
O'Donnell, Colleen	53080	BIO WILD 01
O'Donnell, Deanne	37408	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Ogorzaly, Rose	51292	SER WILD 02
Ohs, Judy	51398	BIO WILD 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Olander, Alan	36508, 43996	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Old Harbor Native Corporation (Marrs, Carl)	51759	P&N 13, SER H&S 02, SER H&S 04, SER LAND 06
Olen, Sian	52100	BIO BIO 01
Oliveira, Cristina	52207	BIO BIO 01
Olsen, Corey	51361	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Olson, David	31697	SER WILD 02

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Olson, Sherry	51494	SER WILD 02
O'Neill, Fran	51422	SER WILD 02
Orchard, Karen	51289	SER WILD 02
Orcholski, Gerald	44004	P&N 06, SER REV 04, SER WILD 01
O'Reilly, Phyllis	44118	ACK 01
Ornelas, Karen	35607, 44161	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
O'Rourke, Marie	51203	ACK 01
Ortiz, Cynthia	31731	ACK 01
Osborn, Dottie	51060	P&N 06, SER LAND 01
Osborne, Lizz	51427	ACK 01
Osland, Gary	51301	BIO BIO 01
Osterback, Vincent A	51906	BIO WILD 03, SER H&S 06, SER REV 11
Ostrer, Allison	51225	SER REV 09
Ostuno, Ernie	51966	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
O'Sullivan, Katherine	51596	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Ouellette, Tracy	31628, 51582	P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 09
Overcash, Malia	62891	P&N 14
Owens, Debra L	51823	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Owlin' Curtis, James	44207	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Ozkan, Dogan	51473	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Packard, Roger	41721, 43908	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Packer, Patti	51382	SER WILD 01
Paddock, Todd	44361	BIO BIO 01, P&N 01, REG 02, SER WILD 01
Paff, Corinnelouise	51232	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Pagan, Elisa	51027	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Palecek, Bridget	51023	ACK 01
Paleias, Linda	44078	SER REV 04, SER WILD 01
Palko, Patricia E	37388	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Palma-Glennie, Janice	44103	BIO BIO 01, SER LAND 01, SER WILD 01
Paltin, Sharon	43944	ACK 01
Pancher, Jason	51414	SER WILD 01
Pangborn, Della	51946	SER REV 04, SER WILD 08

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Parkola, Carol	44034	P&N 01, SER WILD 02
Parlato, Nicholas	51754	ACK 01
Parrish, Scott	44112	ACK 01
Pashler, Hal	44117	SER WILD 01
Paskert, K	51072	ACK 01
Patania, Mary	52039	SER H&S 03, SER REV 04, SER ROAD 18, SER ROAD 35, SER SUB 01
Davis Chang, Patricia	44145	ACK 01
Patterson, Cynthia	31601	P&N 06, REG 03, SER LAND 01, SER WILD 08
Patterson, Nick	53219	REG 03
Paul Roy, John	43957	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Pearce, Judith	51684	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Pearsall, Tom and Judy	44205	ACK 01
Peeples, Michelle	51168	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Penney, Eli	62892	ACK 01
Pennington, Heather	37413, 49365	BIO BIO 01, P&N 06, SER LAND 01, SER REV 09, SER WILD 01
Pennoyer, Christy	51238	BIO BIO 01, SER WILD 01
Perinchief, Jana	35422, 44035	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Perkins, Joel	42835, 51143	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Perry, David	51715	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Perry, Nathaniel	51698	ACK 01
Perryman, Joann	44345	SER WILD 01
Petersen, Becky	51284	P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Petersen, Robert	31733	SER WILD 02
Peterson, Chelsea	51044	SER WILD 01
Peterson, JoAnne	51917	SER H&S 04
Peterson, Kyle	39024, 51512	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Peterson, Linda	31629	ACK 01
Petro, Lorriane	51828	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Petzak, Jamaka	31729	SER WILD 02
Pham, John	44204	SER REV 04

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Philemonof, Dimitri (Aleutian Pribilof Islands Association, Inc.)	52021	HIST 03, P&N 03, SER EJ 01, SER LAND 06, SER ROAD 04
Philip, Natalie	51617	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Phillips, Clifford	43951	REG 03
Phillips, Ed	44159	REG 02
Phillips, Jim	51614	BIO BIO 01, SER WILD 01
Phillips, Stuart	34831, 43955, 43965	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Phread, Pamela	44053	ACK 01
Piano, Cynthia	51078	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Pickering, Amy	51441	REG 03, SER LAND 01, SER WILD 01
Piehl, Jeanne	44284	ACK 01
Pietrzak, Darlene	51431	BIO BIO 01, BIO WILD 01, SER LAND 01
Piihl, Stacy	51086	ACK 01
Pike, Brian	37378, 37380, 40928	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Pine, Joslyn	44306	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Pizza, Diane	44076	SER WILD 01
Plenert, Marvin	53064	SER WILD 01
Plotkin, Stephen	51959	P&N 06, SER REV 04, SER WILD 01
Podraza, Carol	52040	P&N 08
Polis, Rose Polis	44283	SER WILD 01
Pollina, Ron	44285	ACK 01
Pomeroy, Anahata	84135	ACK 01
Pooler, Carole	51308	P&N 06, SER REV 04, SER WILD 01
Porcino, Marilyn	52927	REG 03
Post, Dianne	51343	ACK 01
Posten, Kathryn	52326	SER REV 09
Poulson, Judi	31703, 32919, 39294	ACK 01, BIO BIO 01, P&N 06, REG 03, SER REV 09, SER WILD 01
Pound, Renee	51093	BIO BIO 01, SER WILD 01
Powell, Marion	53265	SER REV 09
Power, Alicia	44215	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Prasad, Kamal	32394, 34051, 44241	BIO BIO 01, P&N 06, REG 03, SER REV 04, SER REV 09, SER WILD 01
Prescott, Melissa	51181	ACK 01
Price, Lori R	51472	SER WILD 01

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Prichard, Rosemary	44097	SER LAND 01, SER WILD 01
Priskich, Fiona	51248	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Proescholdt, Kevin	32540, 40316	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER WILD 01
Prok, Mike	44214	ACK 01
Public Meeting, Anchorage	51920	BIO WILD 01, BIO WILD 03, BIO WILD 26, COOP 01, EDI 07, HIST 02, HIST 03, HIST 04, HIST 05, IAM 01, P&N 01, P&N 03, P&N 07, P&N 08, P&N 11, PAA 02, PAA 03, PAA 26, PHY AQ 02, REG 02, REG 12, SER CUL 01, SER CUL 02, SER H&S 02, SER H&S 04, SER H&S 05, SER H&S 07, SER LAND 01, SER LAND 03, SER LAND 04, SER LAND 06, SER LAND 11, SER REV 09, SER REV 11, SER ROAD 01, SER ROAD 10, SER SER 02, SER SUB 01, SER WILD 01, SER WILD 02, SER WILD 10, SER WILD 13
Public Meeting, Cold Bay	52011	ACK 01, BIO WILD 03, BIO WILD 25, IAM 01, IAM 02, P&N 08, PAA 01, PAA 04, PAA 05, PAA 13, PAA 16, REG 02, REG 14, SER CUL 01, SER EJ 01, SER H&S 02, SER H&S 04, SER LAND 06, SER LAND 11, SER REV 11, SER ROAD 08, SER ROAD 11, SER ROAD 18, SER ROAD 34, SER ROAD 35
Public Meeting, King Cove	52042	BIO VEG 06, BIO WILD 03, DATA 21, DATA 27, HIST 01, HIST 04, HIST 07, IAM 01, MIT 06, MIT 08, MIT 12, PAA 04, PAA 05, PUB 02, REG 12, REG 14, REG 23, REG 24, SER CUL 01, SER CUL 02, SER CUL 03, SER H&S 02, SER H&S 04, SER H&S 07, SER LAND 01, SER REV 07, SER REV 08, SER REV 11, SER ROAD 08, SER ROAD 14, SER SER 05
Public Meeting, Nelson Lagoon and False Pass	52023	BIO WILD 01, IAM 01, SER WILD 10
Public Meeting, Sand Point	52010	BIO FISH 07, BIO WILD 03, BIO WILD 07, BIO WILD 20, BIO WILD 24, COOP 01, HIST 03, IAM 01, MIT 02, MIT 06, P&N 03, PAA 16, PAA 19, PUB 01, REG 12, SER CUL 01, SER H&S 01, SER H&S 02, SER H&S 04, SER LAND 06, SER REV 07, SER REV 11, SER ROAD 04, SER ROAD 10, SER ROAD 13
Public, Jean	31741	ACK 01
Puca, Robert	51600	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Purdy, Bruce	51016	ACK 01

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Qagan Tayagungin Tribe (McGlashan, Rayette)	52028	BIO WILD 29, SER CUL 03, SER H&S 04, SER REV 09
Quirk, Joseph	51035	SER REV 04, SER WILD 01
Radford, Jeff	95993	ACK 01
Raebeck, Wendy	43924	BIO BIO 02
Raeder, Meggi	51613	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Raider, Phil	51641	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Raili, Sierra	62893	ACK 01
Rainsong, Pamela	44067	ACK 01, SER WILD 01
Randall, Bill	51491	ACK 01
Ransom, Cat	86163	ACK 01
Rappaport Clarke, Jamie (Defenders of Wildlife)	31763	PAA 03, PAA 26, REG 08
Raridon, Terri	53139	BIO BIO 02
Rasich, Sandy	51518	ACK 01
Raskin, David (Friends of Alaska National Wildlife Refuges)	31763	PAA 03, PAA 26, REG 08
Raskin, David (Friends of Alaska National Wildlife Refuges)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Rautine, Susan	51118	SER WILD 08
Raymond, Lani	31765	ACK 01
Raymond, Wendy	51156	ACK 01, BIO BIO 01, BIO VEG 05, SER LAND 01, SER WILD 09
Reed, Mary	52119	PAA 18
Reeves, David	44071	P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rehner, Diane	44048	SER REV 04, SER WILD 01

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Reich, Patricia	43985	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Reich, Todd	31649, 51313	ACK 01
Reichert, R	51555	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Reichgott, Christine (United States Environmental Protection Agency)	52020	P&N 09, PAA 13, PAA 22, PAA 24, REG 04, REG 07, REG 21, REG 27, SER LAND 16
Reid, Andrew	51335	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Reid, Marilynn	42356, 44059	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Reinertsen, Mary H	51309	P&N 06
Reinhart, Robin	34587, 44208	BIO BIO 01, P&N 02, P&N 06, SER REV 09, SER WILD 01
Repass, John	51159	P&N 06, SER REV 04, SER WILD 01
Resa, Gloria	51104	SER REV 04, SER WILD 01
Resource Development Council (Portman, Carl)	33126	ACK 01, P&N 03, P&N 08, P&N 13, PAA 01
<i>Resource Development Council</i> Portman, Carl	33126	ACK 01, P&N 03, P&N 08, P&N 13, PAA 01
Revilla, Oscar	51442	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Reynolds, Jim	53095	SER REV 09
Reynolds, Margarite	51120	SER WILD 02
Reynolds, Melissa	52417	SER REV 04
Riar, Jairoop	51038	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Ribeiro, Ana	51416	P&N 02, SER REV 04
Riblett, Mary	51529	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rice, Roger	102593	ACK 01
Rice, Steve	31668	SER REV 04, SER WILD 02
Rich, Nancy	53132	P&N 11
Rich, Philip	52424	BIO WILD 01
Richey, Sarah	51729	SER REV 04, SER WILD 01
Richie, Cavin	51043	ACK 01
Richman, Asja	51283	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Richman, Heather	51911	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Riddle, D	51752	BIO BIO 02
Rider, Alan	31693	SER WILD 08

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Rierson, Barbara	53091	SER REV 09
Rifkind, Michael	51949	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Riley, Maura	51717	ACK 01
Riley, Russell	51461	ACK 01
Ripple, Chris	52606	ACK 01
Rissen, Adam (Wildlands CPR)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Ritchie, Chet	90301	ACK 01
Ritzman, Dan (Sierra Club)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Robbins, Jack	31648	ACK 01
Robert, Alain	51253, 51258	BIO BIO 01, P&N 01, P&N 02, P&N 06, REG 02, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Roberts, Gretchen	44220	ACK 01
Roberts, James	32608, 51305	ACK 01, BIO BIO 01, REG 03, SER WILD 01

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Roberts, Sally	51783	P&N 01, P&N 02, REG 02, SER REV 09, SER WILD 01
Robinson, Naeda	44040, 51721	ACK 01
Robinson, Robert	51194	ACK 01
Rochelle, Lisa	44081	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rockwell, John	51394	ACK 01
Rod, Larry	51411	ACK 01
Rodgers, Patricia	51350	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rodin, Lee	44276	ACK 01
Roenneburg, Drew	31713	SER WILD 09
Rogalin, Suzanne	51743	BIO BIO 01, SER REV 04
Rogers, Ann	43960	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rogers, Dirk	45899, 51973	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Rojeski, Mary	37409	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Roland, Jelica	51517	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rolfes, Helen	51055	ACK 01, P&N 06, SER REV 04, SER WILD 01
Rome, Charity	37406	ACK 01, SER WILD 01
Roper, Dennis	44092	SER H&S 04
Rose, Aaron	52679	SER REV 09
Rose, Joanne	43959	P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rosenberg, Nancy	44066	P&N 06, SER LAND 01, SER REV 04
Rosenblad, Ken	51307	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rosenfeld, Henry & Susan	51955	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Rosenthal, Jessie	37403	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04
Ross, Don	33125	PAA 23, REG 02, SER LAND 04, SER WILD 01
Ross, Elliot	31617, 33663	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Rothrock, Janet	51751	ACK 01
Rowley, Dan (Aleutians East Borough)	31760	SER ROAD 02
Rozycki, Laura	51376	BIO BIO 01, P&N 06, SER LAND 01, SER REV 02, SER REV 09, SER WILD 01
Ruas, Charles	52083	SER WILD 08

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Rubach, Marian	51316	ACK 01
Rubino, Donna	31660	ACK 01
Rudnicki, Susan	51686	SER REV 09, SER WILD 02
Russell, Liane	52048	SER REV 04
Russell, Stuart	51581	ACK 01
Rust, John	31736	BIO BIO 01, BIO BIO 02, SER WILD 08
Ruth	52587	BIO BIO 02
Rutkowski, Robert	31704	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sabin, Dawn	51827	BIO BIO 01, SER WILD 01
Saeks, Joel	51355	SER WILD 02
Sahni, Ramona	51251	ACK 01
Sailer, Randy	31730	SER WILD 02
Sailer, Randy and Carlotta	44192	SER LAND 01, SER REV 04
Saito, Don	37397	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Salazar, Joe	51519	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Salierno, Kinga	37418	SER WILD 01
Salinas, Ana	52972	SER REV 04
Salinas, Ana	97230	ACK 01
Salmon, Kathy	43980	SER WILD 09
Saltzman, Susan	51690	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Samp, Cece	44222	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Samuelson, John	44230	ACK 01
Samuelson, John	52017	SER H&S 04
Samuelson, Maggie	52004	PAA 04, SER H&S 04
Samuelson, Noah	62894	SER H&S 04, SER REV 08, SER ROAD 14
Sand Point, Public Meeting	52010	BIO FISH 07, BIO WILD 03, BIO WILD 07, BIO WILD 20, BIO WILD 24, COOP 01, HIST 03, IAM 01, MIT 02, MIT 06, P&N 03, PAA 16, PAA 19, PUB 01, REG 12, SER CUL 01, SER H&S 01, SER H&S 02, SER H&S 04, SER LAND 06, SER REV 07, SER REV 11, SER ROAD 04, SER ROAD 10, SER ROAD 13
Sandritter, Ann	37417	ACK 01
Sands, Wendy	36954, 51275, 51278	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Santoro, Margo	51138	ACK 01

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Sargent, Andi	44049	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sargent, Shawn	52135	REG 02
Saucedo, Jessica	44185	SER WILD 02
Sauers, Ronald	44156	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Savett, Adam	51192	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Schacht, Timothy	31640	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Schacht, Timothy	43979	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Scheer, Lydia	44171	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Scherer, Molly	51787	SER WILD 01
Schermer, Linda	51176	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Scheuermann, Karen	51374	ACK 01
Schiffman, Lauren	51506	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Schlesinger, Sybil	31698	ACK 01
Schmitt, David	44021	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Schoene, William	31595	ACK 01, P&N 06, REG 28, SER LAND 01
Schrader, Susan	51536	ACK 01
Schraft, Ray	51573	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Schreiber, Karen	39289, 44179	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Schriebman, Judy	31674	SER WILD 08
Schultz, Jennifer	53092	BIO BIO 02
Schwager, Richard	51094	ACK 01
Schwartz, Jake	51407	SER WILD 09
Schwarz, Kurt	43941	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Scott, Greg	51626	BIO BIO 01, P&N 01, P&N 06, PAA 02, REG 02, SER REV 09, SER WILD 01, SER WILD 02, SER WILD 09
Scranton, Liz	51068	SER WILD 01
Seaborg, David	44288	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Seager, Michael	44137	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Seaman, Carol	65653	ACK 01

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Searle, Kerry	51716	SER WILD 01
Searles, Barbara	31635	ACK 01
Sease, Debbie (Sierra Club)	31763	PAA 03, PAA 26, REG 08
Sebastian, Nina	44322	ACK 01
Sebastian, Roberta	44170	ACK 01
Secane, Janet	51204	BIO BIO 01, P&N 06, SER REV 04, SER WILD 02
Secord, Reed	31743	ACK 01, SER WILD 01
Seff, Joshua	48400, 51668	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Seibold, Connie	65835	ACK 01
Seidenschwarz, Gena	51392	ACK 01
Sennello, Patrick	51574	SER WILD 01
Serafin, Stan	44030	ACK 01
Serra, Dawn	51015	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Servais, James	51757	P&N 06, SER REV 04, SER WILD 01
Serviente, Tony	95991	ACK 01
Servis, Jeanne	51400	SER WILD 02
Setar, Tricia	37361	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Seyfried, Mike	51179	BIO BIO 01, SER REV 04, SER WILD 01
Shaack, Paul	51910	ACK 01
Shaffer, Steve	44158	BIO BIO 01
Shallbetter, Bennie	31655	ACK 01
Shamblen, Dean	53276	SER REV 09
Shapiro, Dr. Eve	51640	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sharee, Donna	36057, 44122	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01, SER WILD 02
Sharfman, Bill	44152	ACK 01
Sharloch, Rick	31650	SER WILD 01

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Shavelson, Bob (Cook Inletkeeper)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Shaw, Fred	51184	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sheahan, Patrick	44111	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Shealy, Melody	37362	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Shelly, Art	51239	ACK 01
Sheppard, William	44133	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sheridan, Michelle	44064	P&N 06, SER REV 09
Sherman, Roger	52862	BIO BIO 02
Sherwin, Boyce	41154, 51393	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Sherwonit, Bill	33127	BIO BIO 01, P&N 06, REG 01, SER LAND 01, SER REV 01, SER WILD 02
Shevis, Aron	31647, 51062	BIO BIO 01, SER REV 04, SER WILD 01
Shimata, Kathy	51493	SER WILD 01
Shirkus Moore, Lorraine	44203	ACK 01
Shogan, Cindy (Alaska Wilderness League)	31763	PAA 03, PAA 26, REG 08
Sholiton, Anita	51346	ACK 01
Shook, Matthew	52279	BIO VEG 01
Short, Benjamin	51652	SER WILD 02
Shotz, Alyson	51384	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Shrout, D	37391	ACK 01
Shuptrine, Sandy	51779	P&N 01, SER LAND 01, SER REV 04

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Siegmann, Eric	31683	BIO BIO 01, P&N 06, SER LAND 01, SER WILD 01
Sierra Club (Ritzman, Dan)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Sierra Club (Sease, Debbie)	31763	PAA 03, PAA 26, REG 08
Silkey, Uly	44340	SER WILD 01
Silva, Will	51521	ACK 01, SER LAND 01, SER REV 04
Simon, Carol	51908	ACK 01
Simone	53303	REG 03
Simpson, Colleen	51082, 51741	ACK 01
Singleton, Jennifer	51351	SER WILD 01
Sirk, Katie	51302	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sisson, Maristela	51230	ACK 01
Sittenfeld, Tiernan (League of Conservation Voters)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05

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Sizemore Behrend, Christi	43917	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Small, Sally	44336	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Smeaton, Chris	52960	SER WILD 01
Smith, Allen E	51943	BIO BIO 01, BIO BIO 02, BIO BIO 03, BIO VEG 05, DATA 01, P&N 01, P&N 02, P&N 05, P&N 07, P&N 09, PAA 07, PAA 21, REG 02, REG 03, REG 05, SER LAND 01, SER REV 06, SER REV 09, SER ROAD 01, SER WILD 01, SER WILD 08
Smith, Brian and Patti	98384	ACK 01
Smith, Carol	31639	BIO BIO 01, P&N 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Smith, Daedra	51615	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Smith, Donald	44138	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Smith, Frances and Wendy Fast	51195	PAA 21
Smith, Jeff	51795	ACK 01
Smith, Jeffrey J	51059	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Smith, Joann	52765	SER LAND 09
Smith, Steve	51829	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Smith, Vicki	51845	BIO BIO 02, REG 03
Smock, Addie	44261	BIO BIO 01, SER REV 04, SER WILD 01
Smutko, Joan	43939	ACK 01
Snell, Vivian	53269	ACK 01
Snyder, Brett (Adams County Environmental Task Force)	51440	BIO BIO 01, SER WILD 01
Snyder, Marilyn	51107	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Snyder, Todd	37421	SER WILD 01
Sobanski, Sandra	51383	ACK 01
Soffler, Judy	51585	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Solomon, Diane	51559	ACK 01
Sonoquie, Monique	51052	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Soraghan, Conor	37423	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sorenson, Nancy	44202	BIO BIO 01

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Sorrell, Julie	44172	BIO BIO 01
Souders, Pat	51956	ACK 01
Soule, David	51356	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Spanski, Linda	43937	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Spar, Jon	51233	ACK 01
Spencer, Gayle	51595	REG 02, SER WILD 01
Spencer, Thomas	51700	BIO WILD 01
Spickler, Julie	31633	SER WILD 01
Spiegelman, Robin	51153	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Spillane-Mueller, Carol	51020	ACK 01
Spitzfaden, Yarrow	51756	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Spivey, Benjamin	62895	P&N 08, SER H&S 04, SER LAND 08, SER REV 08
Spotts, Richard	44719	P&N 01, P&N 02, REG 02, SER REV 09, SER WILD 01
Springer, Kim	31670	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sprouse, Sharon	44038	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Squartsoff, Pete	31750	P&N 14
Stachowski, Kathleen	44262	SER WILD 02
Stacy, Katie	53202	SER REV 04
Stahl, Charlotte	51483	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Stall, Spencer	44116	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Stanley, Edh	31700	BIO WILD 01
Stanley, Richard	31747, 32737, 51928	ACK 01, BIO BIO 01, REG 03, SER LAND 01, SER REV 04, SER WILD 01

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State of Alaska (Carroll, Samantha)	52000	BIO FISH 01, BIO FISH 04, BIO FISH 06, BIO VEG 02, BIO WET 03, BIO WET 05, BIO WET 06, BIO WILD 05, BIO WILD 20, BIO WILD 21, BIO WILD 22, BIO WILD 23, BIO WILD 24, BIO WILD 32, BIO WILD 33, BIO WILD 47, BIO WILD 48, COOP 01, DATA 04, DATA 17, DATA 19, DATA 20, DATA 24, DATA 30, EDI 02, EDI 03, EDI 04, EDI 05, EDI 06, IAM 02, IAM 03, IAM 10, MIT 02, MIT 04, MIT 09, MIT 10, MIT 14, PAA 01, PAA 06, PAA 20, PHY CON 02, PHY CON 03, PHY CON 05, PHY HYD 03, PHY HYD 05, PHY HYD 06, PHY PHY 02, PHY PHY 03, PUB 03, REG 06, REG 07, REG 15, REG 16, REG 17, REG 18, REG 19, REG 20, SER ARC 01, SER ARC 03, SER ARC 04, SER LAND 11, SER LAND 17, SER LAND 19, SER LAND 20, SER LAND 21, SER LAND 23, SER REV 02, SER REV 04, SER REV 05, SER ROAD 16, SER ROAD 18, SER ROAD 24, SER ROAD 27, SER ROAD 28, SER ROAD 29, SER ROAD 30, SER ROAD 31, SER ROAD 32, SER ROAD 33, SER ROAD 34, SER ROAD 35, SER ROAD 36, SER ROAD 37, SER SUB 01, SER SUB 06, SER WILD 07, SER WILD 11, SER WILD 12
Stebbing, Gayle J	44277	SER WILD 01
Steel, Carlene	51360	ACK 01, BIO BIO 02, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Stein, Margaret	51173	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Steinbach, Glenn	53097	REG 02
Sternberg, Rachel	51726	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Stevens, Cindy	51976	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 02
Stevens, J.	43948	ACK 01
Stewart, Gayla	51566	ACK 01
Stewart, John	31673, 40698	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Stewart, Sarah	44226	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Stinson, Paula	37422	ACK 01
Stohlmann, Tom	31744	SER WILD 09
Stokes, Brian	45651, 51451	BIO BIO 01, P&N 06, SER LAND 01, SER REV 09, SER WILD 01
Stone, M	51013	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Stradtman, George	51630	ACK 01
Straub, Gwen	53338	BIO BIO 01
Strauss, Mark	51454	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Straut, Shanna	43995	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Stredny, Fran	53007	SER WILD 08
Stringham, David/Debby	51245	SER WILD 08
Strugatsky, Vladimir	43931	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Stuckey, Richard	31643, 51702	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 02
Suarez, Moraima	36302, 51564	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Suda, Mary	52166	REG 03, SER REV 09
Sue Baker, Jolly	51534	ACK 01
Sugihara, Joan	44006	ACK 01
Sullivan, Linda	53235	REG 02
Sullivan, Michael	53323	REG 03
Summers, Donna	44175	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Sutherland, Ian	31669	BIO BIO 01, SER REV 04, SER WILD 01
Sutphin, Andrew	51423	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Svetha, S	51428	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Swain, Mary	51130	ACK 01
Swan, Carolyn	44143	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Swanson, Rebecca	44017	ACK 01
Sweeney, Jim	37354	P&N 02, SER REV 09, SER WILD 01, SER WILD 02
Swift, Joseph	53070	REG 02
Symington, Cindy	51255	P&N 02, REG 01, SER LAND 01
Tackett, Mike	44149	BIO BIO 01, SER LAND 01
Taenzer, Dave	31692	SER WILD 02
Taft, Kathleen	43976	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Tagesen, Peggy	51340	BIO BIO 01, SER WILD 09
Talbot, Ed	51609	REG 02
Tangi, Anna	44102	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Tarr, Richard	53356	REG 02

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Tauber, Sharon F	51748	SER WILD 01
Taylor, Dave	44342	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Taylor, Dulcie	51616	SER WILD 02
Taylor, Gigi	51495	SER WILD 08, SER WILD 09
Taylor, Merideth M	44327	ACK 01
Taylor, Ricky	52961	SER WILD 01
Teresko, Janet	91762	ACK 01
Terry, Terelle	53168	BIO BIO 02
Thayer, Jeff	51264	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
The Wilderness Society (Beller, Melanie)	31763	PAA 03, PAA 26, REG 08
The Wilderness Society (Whittington Evans, Nicole)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
The Wildlife Society (Krausman, Paul)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05

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The Wildlife Society (Krausman, Paul)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Thomas, Carrie	53041	P&N 02
Thomas, Chris	45849, 51105	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Thomas, Georgette	44318	ACK 01
Thomas, Gina	51672	ACK 01
Thompson, Linda	51889	ACK 01
Thompson, Thomas	31679	ACK 01
Thomson, Arni (Alaska Crab Coalition)	33123	ACK 01
Thorn, Debbie	51954	ACK 01
Thornburn, Cathy	52706	SER WILD 08
Tice, Janet	44042	P&N 02, SER LAND 01, SER WILD 01
Tiers, Sarah	31588, 31687	BIO BIO 01, BIO WET 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Tigges, Karen	33129	SER WILD 02
Tim, Strong,	44319	ACK 01
Tindell, Anne	51842	P&N 01, P&N 02, REG 02, SER REV 09, SER WILD 01
Tingiris, Mitchell	51155	ACK 01
Tipler, Becky	44056	SER WILD 01
Tobin, Virginia	51409	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Todd, Carol	51463	ACK 01
Tolski, Stefanie	43907	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Tolson, Mark	50989	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Tomescu, Teofan	51479	BIO BIO 01, SER WILD 01

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Toner, William	31706	ACK 01
Toney, Kevin	51669	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Tonsberg, Barbara	51281	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Torres, Matthew	44196	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Toups, Ryan	51222	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Trainer, Amy	43919	P&N 02, REG 03, SER WILD 01
Trasatto, Carol	44301	REG 03, SER REV 04
Trauner, Priscilla	44080	ACK 01
Travis, Barb & Terry	51984	ACK 01
Trick, Cathy	51025	BIO BIO 01
Trinka, Gloria	51146	SER WILD 08
True, Mary	51139	ACK 01
Trumble, Della	52031	HIST 03, P&N 08, SER H&S 01, SER H&S 04, SER LAND 06
Trumble, Trisha	51999	P&N 03
Trypaluk, Barbara	52416	SER LAND 04
Tsang Yee, Anthony	44041	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Tucker, Veronica	33486, 43926	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Tuke, Carla	51065	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Tullis, Diane	52165	SER LAND 09
Turken, Donald	41531, 51659	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Two-Eagle, Carel	51334	SER LAND 01, SER WILD 01
Tyler, Steve	32251, 51465	ACK 01, BIO BIO 01, REG 03, SER WILD 01
Ulmer, Gene	51193	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Ulvi, Steve	51058	BIO BIO 02, P&N 01, SER WILD 02
Ungar, Luci	51713	ACK 01
United States Army Corps of Engineers (Morgan, Shannon)	31762	BIO WET 06, COOP 02, EDI 02, MIT 15, PAA 07, REG 07, SER REV 03
United States Environmental Protection Agency (Reichgott, Christine)	52020	P&N 09, PAA 13, PAA 22, PAA 24, REG 04, REG 07, REG 21, REG 27, SER LAND 16
United States Geological Survey (Ward, David)	51934	BIO FISH 05, BIO WILD 10, BIO WILD 19, EDI 01, PAA 13, SER ROAD 11

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United States Senate Murkowski, Lisa	51763	BIO WILD 03, P&N 03, SER EJ 01, SER H&S 02, SER H&S 03, SER LAND 06
Unok, Alberta (Alaska Native Health Board)	33120	HIST 03, P&N 03, SER EJ 01, SER LAND 01, SER LAND 06, SER ROAD 04
Uppena, Ruth	53082	BIO BIO 02
Uttecht, Carter	62896	ACK 01, P&N 08, SER H&S 04
Utzig, Albert	31720	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Valent, Cassandra	51385	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Valentine, Jennifer	37430	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Valentine, Tabitha	33130	REG 09
Vallario, Cat	52962	SER WILD 01
Vallero, Daniel	51096	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Van Alyne, Emily	31728, 37432	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Van den Blink, Kieren	44139	ACK 01
van der Scheer, Kilian DH	44245	ACK 01
Van Velson, Nathan	52370	REG 03
Van Vliet, Mary	51011	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Vanderhill, Margo	51510	REG 03, SER LAND 01, SER REV 09, SER WILD 08
Vanderleelie, Roy	51265	ACK 01
Vanzo, Veronica	51963	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Varner-Sheaves, Donna	51692	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Vasily, Karen	37405	BIO BIO 01, P&N 06, SER REV 04
Vaughan, Deborah M	37375	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Venezia, Sherri	37760, 51660	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01, SER WILD 09
Ventre, John	51201	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04
Victor, Myers,	44088	SER WILD 02
Villarreal, Ronald	52922	P&N 11
Vinson, Barbara	52923	SER REV 09
Virgil, Philip	51670	ACK 01
Vitale, Barbara	51368	ACK 01
Vlasopolos, Anca	36819, 51558	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01

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Von Wettberg, Eric	33063, 51148	BIO BIO 01, P&N 06, REG 03, SER LAND 01, SER REV 04, SER WILD 01
Vouros, Pamela	51671	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Vyhnal, Kristin	43956	BIO BIO 01, BIO BIO 02
Wagner, Robert	51266	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wagner, Vickie	51277	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wainschel, Ida	51333	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Walicki, Joe	51049	ACK 01
Walker, Dakota	62897	SER H&S 04
Walker, David	44321	ACK 01
Walker, Fern	44044	SER WILD 01
Walker, John	37360	BIO WILD 01, PAA 21
Walko, Vanessa	31662	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wallach, Aleta	31623	SER WILD 02
Wallach, Violet	31620, 35089	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01, SER WILD 02
Wallis, DeAnne	44216	ACK 01
Walter, G. Richard	37415	BIO BIO 01, P&N 06
Ward, David (United States Geological Survey)	51934	BIO FISH 05, BIO WILD 10, BIO WILD 19, EDI 01, PAA 13, SER ROAD 11
Ward, Matin	51680	ACK 01
Ward, Michael J	44257	BIO BIO 01
Ware, Clifton	31732, 44211	SER WILD 09
Wargo, Cynthia	31665	SER WILD 01
Wargo, Cynthia	51358	P&N 02, SER LAND 01, SER WILD 01
Warner, Sue	51231	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Warnock, Nils (Audubon Alaska)	31763	PAA 03, PAA 26, REG 08

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Warnock, Nils (Audubon Alaska)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Waters, Jeff	53312	BIO BIO 02
Watson, Angela	51809	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Watson, Danny	35481, 43987	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Walton, William B	43932	ACK 01
Watt, Kathy	44068	P&N 06, SER WILD 01
Watters, Ann	51605	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wayland, Barbara	51818	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Webster, Ty	51218	SER WILD 01
Wechter, Michael	44169	REG 03
Wedin, JoAnn	52615	SER WILD 08
Wedow, Nancy	51705	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 02
Wegweiser, Art	51219	ACK 01
Weinischke Harris, Deborah	51344	BIO BIO 01, P&N 06, SER LAND 01
Weinstein, Elyette	51583	ACK 01
Weiss, Amberly	51778	SER H&S 07
Weiss, Ernie	51046	HIST 03, IAM 01, SER ROAD 05, SER SER 01
Weiss, Taylor	62898	SER LAND 08
Weitz, Stephen	35344, 44320	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Wellington, Mary	52209	PHY AQ 01
Wells, Allen R	62905	ACK 01
Wells, Susan L	44341	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Wendland, Gary	53263	SER WILD 09
Wendt-Salisbury, Ingrid	67369	ACK 01
Wener, Tina	43981	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wenzer, Kenneth C	51460	ACK 01
Wessel, Rita	44212	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
West, Robin	31764	P&N 09, P&N 11, PAA 18, PAA 24, SER LAND 02, SER LAND 03, SER ROAD 03, SER SUB 01, SER WILD 02
Western Lands Project (Blaeloch, Janine)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Weyhrich, Patty	51206	ACK 01
Whitaker, Gene	69115	ACK 01
Whitaker, Gene	49003, 51412	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Whitehead, Carole	51750	BIO BIO 02
Whitlow, Scott	77301	ACK 01
Whitney, Stephen	100683	ACK 01
Whittington-Evans, Nicole	51770	DATA 01, MIT 16, SER REV 02, SER REV 03, SER REV 04, SER REV 08, SER REV 09, SER REV 12
Wible, Karen	51524	ACK 01
Wick, Jodi	51907	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wicker, David	52019	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Widman, Nancy J	44229	ACK 01
Wiebe, Albert	37410	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

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Wiebe, Mary	51569	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wilbur, Lynn	51269, 51271	ACK 01, P&N 11, SER REV 04
Wilder, Jenny	51142	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wilderness Watch (Nickas, George)	31763	PAA 03, PAA 26, REG 08
Wilderness Watch (Nickas, George)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Wildlands CPR (Rissen, Adam)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Wildseed, Johnny	31638	ACK 01
Wille, Bruce	44313, 48629	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01

Commenter	Submission ID	Comments
Williams, Christopher E (American Rivers)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Williams, David	51528	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01, SER WILD 09
Williams, Elise	31756	ACK 01
Williams, Holly	51433	SER WILD 01
Williams, Margaret (World Wildlife Fund)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Williams, Mary	31988, 51530	ACK 01, BIO BIO 01, REG 03, SER WILD 01
Williamson, Brent	51246	ACK 01
Willis, Wade	51798	BIO WILD 24, BIO WILD 26, P&N 01, P&N 11, REG 03, SER H&S 03, SER ROAD 09, SER SUB 01, SER SUB 02
Wilson, Arriana	62899	ACK 01
Wilson, Dina	51612	SER WILD 01
Wilson, John	51560	ACK 01
Wilson, Mallorie	62900	ACK 01

Commenter	Submission ID	Comments
Wilson, Sydney	62901	SER H&S 04, SER LAND 03, SER REV 08, SER REV 11
Wilson, Thomas	52013	SER WILD 01
Winder, Theresa	43927	ACK 01
Winholtz, Betty	51455	P&N 06, SER WILD 01
Winkleman, Henry	51323	ACK 01
Winter, Margery	51151	BIO WET 05, PHY AQ 01, SER WILD 01
Winters, Valerie	51548	ACK 01
Wirth, Barbara	44355	ACK 01
Wittrock, Paul	102094	ACK 01
Wohlsen, Marian	44096	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wolf, David	51838	P&N 02
Wolf, Martin	31611	BIO BIO 01, P&N 06, SER LAND 01, SER SUB 01, SER WILD 01
Wolfe, Gerry	37373	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wolfram, Wayne	51268	SER LAND 01, SER REV 04, SER WILD 01
Wolpa, Robert	34973, 51732	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Wolverton, William H	51017	P&N 06, SER REV 04, SER WILD 01
Wood-Constable, Mary	51290	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Woods, Miriam	53100	BIO WILD 01
World Wildlife Fund (Williams, Margaret)	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO WILD 04, BIO WILD 05, BIO WILD 06, BIO WILD 08, BIO WILD 09, BIO WILD 24, BIO WILD 26, BIO WILD 29, DATA 02, DATA 03, DATA 04, DATA 06, DATA 07, DATA 08, DATA 09, DATA 10, DATA 11, DATA 12, DATA 13, DATA 19, DATA 22, DATA 25, DATA 28, DATA 29, MIT 03, P&N 01, P&N 07, PAA 02, PAA 07, PAA 08, PAA 21, PHY AQ 02, PHY CON 04, PHY HYD 02, PHY PHY 04, REG 01, REG 02, REG 03, REG 05, REG 07, REG 08, REG 10, REG 11, REG 12, SER LAND 01, SER LAND 04, SER LAND 10, SER REV 02, SER REV 08, SER ROAD 01, SER ROAD 07, SER SUB 01, SER WILD 02, SER WILD 03, SER WILD 04, SER WILD 05
Wormley, Peter	44014	SER WILD 01
Wouk, Kari	31605, 50466	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01

Commenter	Submission ID	Comments
Wulfsohn, Aubrey	43929	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wurtz, Stephen	44239	ACK 01
Xavier, Marjorie	51273	BIO BIO 01
Yancey, Bob	51725	ACK 01
Yarbrough, Jim	31682, 51152	ACK 01
Yarnell, Jodi	31603	BIO BIO 01, P&N 06, REG 01, REG 02
Yarrobino, Erin	51964	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Yatchmeneff, Katie	62902	SER H&S 01, SER H&S 04, SER H&S 07
Yatchmeneff, Marylee	62903	IAM 01, P&N 08, PAA 04, SER H&S 04, SER REV 08, SER SER 05
Yatchmeneff, Monica	62904	P&N 08, P&N 14, SER H&S 04
Yatchmeneff, Rachel	103611	P&N 03, SER H&S 01, SER H&S 04, SER SER 01
Yatchmeneff, Viola	37241, 51768	HIST 03, MIT 06, P&N 03, P&N 08, SER LAND 06
Ycas, Trevor	51951	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Yester, Jerry	51924	ACK 01
Yoder, Peggy	77487	ACK 01
Yoo, Deborah	43918	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Yoshida, Candace	50202, 51187	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Yost, Gaylord	44191	BIO BIO 01, BIO WILD 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Young, Diane	52090	BIO WILD 01
Young, Don	51922	P&N 03, SER H&S 02
Young, Nancy	44002, 48985	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Young, Sue	51526	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Zade-Routier, Sylvia	51252	ACK 01
Zagray, James	51699	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Zajac, Corinne	51359	SER WILD 09
Zaretsky, Theda	51295	ACK 01
Zega, Susan	51728	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Zegada, Marcela	44151	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
Zeitz, Rebecca	52348	BIO WILD 01

<b>Commenter</b>	<b>Submission ID</b>	<b>Comments</b>
Zellmer, Cheryl	43921	ACK 01
Zenker, Elisabeth	51244	ACK 01, SER LAND 01, SER REV 04, SER WILD 01
Ziegler, Cynthia	51182	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01
Ziegler, Dan	51439	BIO BIO 01, SER WILD 01, SER WILD 02
Zientek, Wolfgang	51417	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Zimmer, Arlene	33956, 44332	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
Zimmermann, Adele E	51578	BIO WILD 01, SER REV 02, SER ROAD 01
Zirkle, Jon	51531	SER WILD 08
Zucchi, Robert	86689	ACK 01
Zucker, Lee	43914	ACK 01
Zuckerman, Barry	44299	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01

**APPENDIX G-2**

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**STATEMENTS OF CONCERN FOR FORM LETTERS**

Organization	SubmissionText	Statement of Concern
Defenders of Wildlife	<p>Dear Haskett, As a supporter of Defenders of Wildlife, I strongly oppose the proposed land exchange that would allow a destructive and unnecessary road through Izembek National Wildlife Refuge, and urge you to support a No Action alternative. Izembek Refuge is a special place. More than 90 percent of the refuge is designated as Wilderness, and it is recognized as a Wetlands of International Importance by the Ramsar Convention. It is one of Alaska's most ecologically unique refuges, with stunning lagoons and tundra habitat that support brown bears, wolverines, caribou and tens of thousands of migratory birds. The proposed land exchange and destructive road that comes with it would devastate this unspoiled place. It would blaze an expensive and unnecessary road right through the heart of Izembek, disturbing the fragile habitat and sensitive wildlife that live there. The road would also cost taxpayers at least \$23.4 million and address a problem already solved by Congress in 1998. Back then, Congress passed the King Cove Health and Safety Act that set aside \$37.5 million to improve medical and transportation facilities in the community of King Cove, including a \$9 million hovercraft to provide emergency marine transport to Cold Bay. The law put in place a system that has already saved lives -- and specifically prohibited a road through the Izembek's federally protected Wilderness. The proposed land exchange would allow for about 150 acres of designated Wilderness within Izembek National Wildlife Refuge to be withdrawn for construction of the road. Such a transfer would remove federal protections and set a terrible precedent that threatens other refuges and wilderness areas. The road would go directly through highly sensitive habitat and would impact many vulnerable species -- including the threatened Steller's eider, nearly the entire population of Pacific black brant and emperor geese, along with grizzly bears, salmon and the other wildlife that depend on Izembek National Wildlife Refuge. I urge you to keep Izembek Refuge protected by rejecting this harmful and costly road and land exchange, and I look forward to hearing from you on this issue. Sincerely,</p>	BIO 01, P&N 06, SER REV 09, SER WILD 01
National Wildlife Refuge Association	<p>Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) regarding the proposed road and land exchange in the Izembek NWR. I stand with the National Wildlife Refuge Association in my opposition to the proposal because it is unnecessary and will result in irreparable impacts to the refuge and its designated Wilderness. A previous EIS completed in 2003 found that a road would be devastating to the refuge. That EIS evaluated the road as a "no option alternative" when determining which transportation tool would be best to enable medical evacuations from King Cove to Cold Bay and the science presented just a few short years ago showed the impacts from a road would be devastating. The "no action alternative" should be adopted in the current final EIS. As your agency issues a final EIS, I urge you to evaluate the impact to refuges nationwide by de-designation of a Wilderness for a land exchange. The road would be the first ever to bisect a congressionally-designated Wilderness, the highest level of protection that can be bestowed by the United States. The precedent opens the door for other Wilderness areas to be destroyed - not only on Refuges, but National Parks, Forests and other federal lands. A road through Wilderness is not compatible with the purposes for which the refuge was created - to conserve fish and wildlife populations and their habitats; to fulfill the United States' international treaty obligations (such as the four migratory bird treaties and the Convention on Wetlands of International Importance); to provide for continued subsistence by local residents; and to ensure water quality and</p>	P&N 01, P&N 02, REG 02, SER REV 09, SER WILD 01

Organization	SubmissionText	Statement of Concern
	<p>quantity within the Refuge. Further, this is a solution in search of a problem. The people of King Cove have a proven, reliable hovercraft for medical evacuations bringing people from King Cove to Cold Bay in 20 minutes; a road would take more than 2 hours in good conditions. The Aleutians East Borough has currently halted operation of the hovercraft - despite its amazing success rate - saying that it is too costly to operate. However, they have petitioned the FWS to allow them to transfer the hovercraft to another part of their community where it would provide EXACTLY the same service. As an American taxpayer, my funds have already been spent providing a reliable transportation solution to the people of King Cove and I urge you to select the No Action Alternative in your Final EIS. The wildlife values of the Izembek National Wildlife Refuge are globally significant and should not be compromised and no more American taxpayer dollars should be spent on this boondoggle proposal. For the reasons stated above, I stand with the National Wildlife Refuge Association in urging you to please adopt the no action alternative. Thank you for your consideration of my comments. Sincerely,</p>	
Sierra Club	<p>Project Team Leader, U.S. Fish and Wildlife Service Stephanie Brady Dear Project Team Leader, U.S. Fish and Wildlife Service Brady, The Izembek National Wildlife Refuge in the Aleutian Islands of Alaska is a beautiful and wild landscape, home to endangered animals like sea otters, eiders, and Stellar Sea Lions. A proposed road through this refuge would require extensive development, construction and maintenance, forever altering this fragile ecosystem. A road would fragment the ecological heart of the wildlife refuge, repeal Congressionally-designated Refuge Wilderness, and permanently compromise a Wetland of International Significance and Important Bird Area. The Izembek Land Exchange/Road Corridor Draft Environmental Impact Statement includes a No Action Alternative, which the U.S. Fish and Wildlife Service should propose as its final recommendation. The road proposal violates the purposes and mission of the refuge and sets a bad precedent for Wilderness designation. All of society has a stake in retaining these long-standing protections by the government and its agencies. The road proposal is not in the public interest, Adopt the No Action Alternative.</p>	BIO BIO 01, REG 03, SER WILD 01
Alaska Wilderness League	I support the no action alternative.	ACK 01
King Cove Petitions	Dear Secretary Saslazar Road Petition in favor of a Road to Cold Bay	ACK 01

**APPENDIX G-3**

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Public Facilities
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Conservation
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  - D.1 Alaska Native Health Board

- D.2 Agdaagux Tribal Council of King Cove
- D.3 Aleutian Pribilof Islands Association
- D.4 Belkofski Corporation
- D.5 Belkofski Tribal Council
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  - E.6 Viola Yatchmeneff
  - E.7 Californians for Western Wilderness
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  - E.9 Becky Bendixon
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  - E.11 Allen Smith
  - E.12 David McCargo
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## **APPENDIX G-3**

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### **SAMPLE COMMENT LETTERS**

- A. Transcripts of the five public meetings with testimony by many individuals**

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U.S. FISH & WILDLIFE SERVICE  
IZEMBEK NATIONAL WILDLIFE REFUGE  
LAND EXCHANGE/ROAD CORRIDOR  
PUBLIC MEETING  
for the Draft Environmental Impact Statement

Taken May 3, 2012  
Commencing at 7:00 p.m.  
Volume I - Pages 1 - 95, inclusive

Taken at  
Campbell Creek Science Center  
Anchorage, Alaska

Reported by: Valerie Martinez, RPR

Page 2

1                                   A-P-P-E-A-R-A-N-C-E-S  
2 For U.S. Fish and Wildlife Service:  
3                   Polly Wheeler  
4                   Mike Boylan  
5                   Stephanie Brady (telephonic)  
6  
7 For URS Corporation:  
8                   Joan Kluwe  
9                   Jon Isaacs  
10                  Taylor Brelsford  
11  
12 Taken by:  
13                  Valerie Martinez, RPR  
14  
15  
16 BE IT KNOWN that the aforementioned proceedings were  
17 taken at the time and place duly noted on the title  
18 page, before Valerie Martinez, Registered Professional  
19 Reporter and Notary Public within and for the State of  
20 Alaska.  
21  
22  
23  
24  
25

Page 3

1                                   P-R-O-C-E-E-D-I-N-G-S  
2                   **POLLY WHEELER:** Thanks, everybody, for being  
3 here. The whole front row here is open. So if anybody  
4 is so inclined, there's lots of extra seats up here.  
5                   Good evening. My name is Polly Wheeler. I'm  
6 with the Fish and Wildlife Service, the National  
7 Wildlife Refuge System. Thanks a lot for being here  
8 tonight. It took a lot, I know, to come in on this  
9 beautiful evening, but we also know that this is a  
10 really important issue to everybody, so we'll try and  
11 get started here.  
12                  Before we do get started, Joan Kluwe with the  
13 URS, who is the chief contractor when we did the EIS  
14 under -- the draft EIS under the guise of the Fish and  
15 Wildlife Service, she's going to introduce the formal  
16 cooperators. And then I'll tell you a little bit about  
17 how we're going to be doing things tonight and then we  
18 can get started off.  
19                  So, Joan?  
20                  **JOAN KLUWE:** Good evening. I'm Joan Kluwe  
21 with URS Corporation, as Polly said. We have two other  
22 URS employees with us tonight. John Isaacs is in the  
23 back and Taylor Brelsford disappeared.  
24                  Where are you, Taylor?  
25                  There he is.

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1                   **TAYLOR BRELSFORD:** I'm short.  
2                   **JOAN KLUWE:** Thanks.  
3                   And the cooperators, would you all stand as  
4 well and I'll introduce you one by one?  
5                   Everybody can have a glance at who is the  
6 cooperating agencies. Gary Hennigh is with the City of  
7 King Cove. Della Trumble is with the Agdaagux Tribe and  
8 the King Cove Corporation. Samantha Carroll is with the  
9 State of Alaska. Bill Ballard is with State DOT. And  
10 Bill Lushkin?  
11                  **ED FOGELS:** Ed Fogels.  
12                  **JOAN KLUWE:** Ed Fogels. Sorry. Haven't met  
13 you yet, Ed. Nice to meet you.  
14                  Heather Boyer is with the Corps of Engineers.  
15 And I think that is all the cooperators with us tonight.  
16                  And thank you all for coming.  
17                  These folks have been working on this project  
18 with us side by side for a year and a half now. We're  
19 headed towards two years very closely.  
20                  Thank you all for coming.  
21                  **POLLY WHEELER:** Okay. Just a little bit in  
22 terms of how we're going to do this tonight. This is  
23 Mike Boylan. He works also with Fish and Wildlife  
24 Service, Refuge System. And Mike is going to run  
25 through the PowerPoint.

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1                   Now, we all know why we're here tonight. And  
2 I will say in advance, the PowerPoint is 40 slides long  
3 and it's got a lot of text in it. So we're not -- we're  
4 going to try and hit the highlights. You could say  
5 there's a lot of highlights because of 40 pages, but we  
6 did make copies of the PowerPoint. It's in the back of  
7 the room.  
8                  So we may cover some of the information rather  
9 quickly, but hopefully if you have any -- you can go  
10 back and take the time to look at the PowerPoint. We're  
11 going to try not to read you every word on every slide  
12 because we know that you're anxious to give your  
13 testimony and that's really -- that's what we're here  
14 for tonight is to listen to your comments and concerns.  
15                  So we may run through it quickly, but again  
16 there's copies of that in the back. There's also copies  
17 of the CD and the executive summary of the draft EIS as  
18 well. And we have hundreds of copies, so please feel  
19 free to take them and read them at your leisure.  
20                  Just as a reminder, when we get to the public  
21 testimony stage, everybody got a number when they signed  
22 in. I think we've got about 30, 35 people signed up  
23 thus far. And we'll be looking at about three minutes.  
24 If people can try and be concise in their comments. You  
25 did get a number. We'll try and follow that order as we

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1 move through.  
2 We do have a court transcriptionist who will  
3 be getting every word. Those of us that are here with  
4 Fish and Wildlife Service will also be writing things  
5 down, but we'll have a word-for-word transcription of  
6 the testimony, so that will help us down the road.  
7 So without any further ado, I'm going to turn  
8 it over to Mike who will -- turn the mic to Mike -- and  
9 he will run through the PowerPoint.  
10 Thank you.  
11 **MIKE BOYLAN:** Thanks, Polly.  
12 I'll try to go through this. Again, it's not  
13 going to be death by PowerPoint, but you're probably  
14 going to be injured. I would like to be able to talk  
15 like an auctioneer, but I can't, so we're just going to  
16 get going quickly.  
17 And if you would hold your questions to the  
18 end, please, when you have those. But, again, the main  
19 reason is not to hear a bureaucrat talk here. It's to  
20 hear from you. So that's why I'm trying to get through  
21 this very quickly.  
22 Okay. Starting off, the agenda tonight, first  
23 of all, we will do an overview of the Public Land  
24 Management Act of 2009, which directed that we do an EIS  
25 for a proposed land exchange; the various cooperating

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1 agency roles of the proposed action; a little bit about  
2 the Izembek National Wildlife Refuge; the purpose and  
3 need for the draft EIS; issues that were identified in  
4 the scoping; the five draft EIS alternatives; mitigation  
5 measures; impact conclusions; the public process,  
6 comment process, and how this fits in; and the next  
7 steps.  
8 **JOAN KLUWE:** And, Mike, I forgot to mention  
9 that the cooperators -- there's also some on the phone  
10 as well, but that is a muted line.  
11 **MIKE BOYLAN:** There are some cooperators on  
12 the phone also, but they can't -- they can't speak in.  
13 They are listening in, though.  
14 The Omnibus Public Land Management Act of 2009  
15 directed that we do an environmental impact statement to  
16 consider a proposed land exchange directed by the  
17 Secretary of the Interior; at least one road alternative  
18 must have been analyzed and must be analyzed -- and, in  
19 fact, there are two -- and that the Secretary of the  
20 Interior will determine if the land exchange -- the  
21 proposed land exchange is in the public interest.  
22 The cooperating agencies. The Act identified  
23 the cooperating agencies, and there's a written MOU that  
24 spells out their roles and responsibilities. But the  
25 lead agency is responsible for determining the scope of

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1 the EIS and issuing a record of decision. That's the  
2 U.S. Fish and Wildlife Service.  
3 Okay. The proposed action: A land exchange  
4 for the purpose of constructing and operating a  
5 single-lane gravel road between -- linking the  
6 communities of King Cove and Cold Bay. The road shall  
7 be used primarily for health and safety purposes and  
8 only for noncommercial purposes, with the exception of  
9 taxis and shared rides, like vanpools.  
10 Okay. The land exchange proposed in the Act  
11 was to be -- and these are rough numbers -- 206 acres of  
12 the Izembek National Wildlife Refuge/Wilderness would be  
13 conveyed to the State for 206 linear acres for a road  
14 corridor. 1,600 acres from the Alaska Maritime National  
15 Wildlife Refuge would be conveyed to the State, and  
16 that's on Sitkinak Island, which is mostly State-owned  
17 already.  
18 43,093 acres of State land would be conveyed  
19 to the U.S. and added to the Alaska Peninsula National  
20 Wildlife Refuge as wilderness. Another 13,300 acres of  
21 King Cove Corporation land near Mortensens Lagoon and  
22 the mouth of Kinzarof Lagoon would be conveyed to the  
23 U.S. And the Kinzarof parcel would be part of the  
24 Izembek Wilderness.  
25 And, finally, the King Cove Corporation would

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1 relinquish its selection of 5,430 acres in the Izembek  
2 Wilderness, but make alternative selections outside of  
3 wilderness.  
4 Okay. On the map, the way this looks . . .  
5 **JOAN KLUWE:** Oh, sorry.  
6 **MIKE BOYLAN:** On the map, these are the two  
7 potential road corridors. And approximately -- each one  
8 would be approximately 206 acres of land, of federal  
9 land, within the Izembek Wilderness, but only one of  
10 those corridors will be picked. So those are the two  
11 alternatives we'll talk about later.  
12 Also, the State would be giving up  
13 43,093 acres up here of State land that is proposed to  
14 be transferred to the U.S. Fish and Wildlife Service.  
15 **JOAN KLUWE:** I think that would become  
16 wilderness.  
17 **MIKE BOYLAN:** That's non-wilderness.  
18 **JOAN KLUWE:** It would become wilderness.  
19 **MIKE BOYLAN:** Would become wilderness, yes.  
20 In addition -- the federal government, what it  
21 would be giving up in addition to this 206 acres, is on  
22 Sitkinak Island, a total of 1600 acres of federal land  
23 proposed for transfer to the State. These two parcels.  
24 As I said, most of Sitkinak Island is already State  
25 land.

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1 Another 13,300 acres of land owned by King  
2 Cove Corporation would be transferred to the U.S.,  
3 including 5,430 acres, which would relinquish their  
4 selection rights in wilderness.  
5 Okay. Some of the other requirements of the  
6 Act. You might call them mitigation measures. It calls  
7 for a cable barrier on each side of this proposed road,  
8 unless another type of barrier is required in the record  
9 of decision, but at a minimum, a cable barrier. It  
10 would minimize adverse impact of the road corridor on  
11 the refuge; there would be a mitigation plan, including  
12 avoiding wildlife impacts and mitigation of wetland  
13 loss; transfer the minimum acreage of federal land  
14 required for construction of the road; to incorporate  
15 the existing roads to the maximum degree possible; and  
16 the State lands within Kinzarof Lagoon would be  
17 designated as a State Game Refuge.  
18 A little bit of Izembek -- the history on  
19 Izembek Refuge. It was established in 1960 as the  
20 Izembek National Wildlife Range. Then it was  
21 redesignated by ANILCA, the Alaska National Interest  
22 Lands Conservation Act, in 1980 as the Izembek National  
23 Wildlife Refuge. And ANILCA also established the  
24 Izembek Wilderness.  
25 Izembek is one of the most biologically

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1 significant refuges. It's one of the smallest of  
2 Alaska's 16 refuges, and most of it is designated  
3 wilderness. And it's got a diverse array of wildlife  
4 species at the end of the Alaska Peninsula. And it  
5 includes five species of salmon; furbearers, such as  
6 wolf, fox, and wolverine; large mammals, such as caribou  
7 and brown bear; shorebirds, waterfowl, and seabirds.  
8 Some other things. It's part of the Aleutian  
9 Islands Biosphere Reserve. It was designated as an  
10 International Biosphere Reserve in 1976. And very  
11 significantly, Izembek was designated the first American  
12 Wetland of International Importance, a Ramsar wetland,  
13 in 1986. And it's one of only 19 Wetlands of  
14 International Importance in the United States. And it's  
15 a globally important bird area as well. About 98  
16 percent of the world's population of Pacific black brant  
17 come to Izembek in the fall.  
18 The Izembek Refuge region is rich in cultural  
19 history. The Aleut people have lived there for over  
20 3,000 -- since 3,000 B.C. at least, and they continue to  
21 reside in the local communities. And in the 18th and  
22 19th centuries, the Russians explored the area and  
23 established some fur trading posts, often resettling the  
24 Aleut in the process.  
25 World War II remnants are still available --

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1 still visible. And depressions from military barracks  
2 dot the landscape. A lot of Izembek has been cleaned up  
3 of the military's debris.  
4 The residents of King Cove have been  
5 advocating for the proposed road for over 25 years.  
6 This is nothing new. They've been advocating for this  
7 for over 25 years. It shows their commitment, their  
8 dedication, their concern. They have concluded that a  
9 road is necessary for the health and safety of their  
10 residents.  
11 The proposed land exchange would transfer a  
12 road corridor that would allow a construction of a  
13 one-lane -- a single-lane gravel road between King Cove  
14 and Cold Bay. And the proposed road is to be used  
15 primarily to address health and safety issues so they  
16 can get to the airport.  
17 The major needs, they say, health and safety,  
18 reliable and safe transportation for medical care,  
19 including emergencies; second, quality of life -- the  
20 ability to drive to the nearest airport, the major  
21 airport, linking Cold Bay in that area, that region,  
22 with Anchorage -- and, three, affordable transportation,  
23 because right now the round-trip airfare is over \$200  
24 between King Cove and Cold Bay on PenAir.  
25 Some of the issues identified in the scoping.

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1 I'm not going to go through all those. You can read  
2 them. But they involve the physical environment, the  
3 biological environment, social environment,  
4 socioeconomics, wilderness, threatening endangered  
5 species.  
6 There are five alternatives in the draft EIS.  
7 The first alternative is called the no-action  
8 alternative. That's just the way things are now.  
9 The second alternative is a land exchange and  
10 a southern road alignment. Alternative three is a land  
11 exchange and what's called a central road alignment. So  
12 two alignments -- two alternatives that call for a road.  
13 Alternative four is a hovercraft operation  
14 from the Northeast Hovercraft Terminal to Cross Wind  
15 Cove over by Cold Bay. And that would be six days a  
16 week. And the hovercraft is not operating. This draft  
17 EIS was conceived and was begun and initiated and  
18 completed really before the hovercraft was taken out of  
19 operation. That's why it's -- but it's still in there.  
20 And the fifth alternative is a Lenard Harbor  
21 ferry from the King Cove side to Cold Bay with  
22 improvements to the Cold Bay dock. So those are the  
23 five alternatives.  
24 Alternative one, the no action, there would be  
25 no land change. We use -- the current modes of

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1 transportation would continue to work, including air  
2 service, personal marine vessels, ferry service, which  
3 is twice monthly in the summer, and seasonal hovercraft  
4 service, three days a week.  
5       In November of 2011, the Aleutians East  
6 Borough announced they would not resume hovercraft  
7 service in the area, so we are going to redefine and fix  
8 that no-action alternative.  
9       Estimated cost of the no-action alternative,  
10 \$1 million annual operation and maintenance and  
11 \$26.3 million over the life cycle of the project.  
12       Alternative one is a revised no action. And  
13 by this one, the -- in February and March 2012, the  
14 Aleutians East Borough identified an aluminum landing  
15 craft/passenger ferry as a potential marine  
16 transportation link if the road is not constructed.  
17 But, again, the no action would still continue current  
18 modes of transportation and there would be no land  
19 exchange.  
20       Alternative two, the land exchange and the  
21 southern road alignment. This would have 201 linear  
22 acres for a road corridor removed from the refuge,  
23 including 131 acres in the Izembek Wilderness. A total  
24 of 52,500 acres would be added to the refuge; 8,092  
25 acres of refuge lands and 44,500 acres designated

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1 wilderness; and 5,430 acres of Native-selected land  
2 would be retained in the wilderness.  
3       This would call for a road -- 19.4 miles is  
4 the total road length, 12 and a half miles of which  
5 would be new construction and six miles constructed on  
6 existing roads and trails, and nine-tenths of a mile of  
7 the existing road. The road footprint would be 107  
8 acres with 3.8 acres of wetlands filled.  
9       There would be a boundary adjustment near  
10 Blinn Lake. A portion of the alignment would be  
11 exclusive to the southern route, located only in the  
12 watershed of Kinzarof Lagoon. And the estimated cost of  
13 construction, about \$20.7 million; \$149,000 is annual  
14 operation and maintenance; and \$23.4 million over the  
15 life cycle of the project.  
16       This shows the alignment of the -- these are  
17 the two potential road alignments. And this is the one  
18 they call the southern road alignment. And this would  
19 be the northern -- central road alignment. So it would  
20 be one or the other, not both. And each one is about  
21 200-and-some acres.  
22       Alternative three, land exchange and the  
23 central road alignment. This calls for a little bit  
24 larger -- 227-acre road corridor. And about the same in  
25 terms of acreage added to the refuge, 52,000-something;

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1 8,000 acres of refuge lands and 44,500 of designated  
2 wilderness and then the 5,430 acres of selected land  
3 would be retained in wilderness.  
4       And about a 21 -- a little bit longer road --  
5 about 21.6 miles; 11 miles of new construction, nine  
6 miles on existing roads and trails, 1.6 miles of the  
7 existing road. The road footprint, 100 acres, and a  
8 little bit less wetlands to fill, 2.4 versus 3.8 in the  
9 earlier one.  
10       Again, the two roads that we showed.  
11       Alternative four, hovercraft operations from  
12 Northeast Hovercraft Terminal to Cross Wind Cove.  
13 Again, the hovercraft is not going to be operating, but  
14 we did the analysis on it. This was proposed -- the  
15 proposed action in the 2003 -- the original Izembek EIS  
16 and continues that alternative.  
17       There would be no construction or  
18 ground-disturbing activities beyond what was authorized  
19 in 2003; mainly the completion of the Northeast  
20 Hovercraft Terminal and the access road; and they would  
21 use the existing hovercraft and existing terminal at  
22 Cross Wind Cove over on the Cold Bay side.  
23       The estimated cost of construction is zero  
24 because that's already been planned for and constructed.  
25 And a 2-million-dollar annual operation and maintenance

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1 and a 44-million-dollar life cycle cost. And there  
2 would be no land exchange under this one, continue to  
3 use the hovercraft.  
4       Here's where -- the last place from Lenard  
5 Cove that the hovercraft operated over here. This road  
6 is now being completed -- or is completed up to the  
7 Northeast Hovercraft Terminal here and then it would go  
8 over to Cross Wind Cove and Cold Bay.  
9       Alternative five calls for a ferry from Lenard  
10 Harbor. And this would be an icebreaker kind of a ferry  
11 that would stand up to the weather and the waves and the  
12 climate out there. And it would require a major --  
13 well, it would be a Lenard Harbor ferry dock and  
14 terminal. And it would require a major modification of  
15 the Cold Bay dock, including a wave barrier, vehicle  
16 ramp system, pedestrian walkway.  
17       This would be a displacement monohull,  
18 open-deck ferry with icebreaking capabilities. And it  
19 would require a materials site, a disposal site, and a  
20 temporary barge landing site. Ferry service estimated  
21 at six days a week, as was called for in the 2003 EIS.  
22       And the construction cost estimated at \$27  
23 million with \$2.3 million in annual operation and  
24 maintenance and a 70-million-dollar life cycle. Again,  
25 no land exchange.

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1 And this is how the ferry would come out, from  
2 Lenard Harbor here, close to the King Cove Airport,  
3 across to the Cold Bay dock.  
4 A number of the -- the draft EIS considered a  
5 number of mitigation measures, including physical,  
6 social, and biological environments, and these are some  
7 of them: Erosion and sediment control; hydro-acoustic  
8 assessment; hazardous materials, petroleum project  
9 control; fish and wildlife protection -- obviously the  
10 biological environment being primary -- invasive species  
11 concerns, integrated pest management; road use  
12 restrictions; access and disturbance.  
13 And then in the social environment in terms of  
14 law enforcement; fares, subsidies, and additional  
15 revenues; standard health and safety practices. These  
16 are some of the mitigation measures that were considered  
17 in the draft EIS.  
18 The conclusion, the impact conclusion summary.  
19 Alternative one, the no action, what they've got now  
20 with the hovercraft operation: Negligible to minor  
21 effects, except moderate effects to fiscal resources.  
22 The borough has estimated \$1 million a year to -- I  
23 believe it is to run the hovercraft operation, which is  
24 financially extremely difficult.  
25 Effects generally related to the ongoing

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1 operations of the hovercraft and eventual conveyance of  
2 approximately 5,430 acres in Izembek Wilderness to King  
3 Cove; a seasonal hovercraft service would supplement  
4 existing aircraft transportation. Although not optimal,  
5 this improvement in public health and transportation  
6 options may be considered a minor beneficial effect.  
7 And, again, annual operation maintenance costs of \$1  
8 million.  
9 Now, this is going to be -- this alternative  
10 one -- updated in the final EIS to reflect the borough's  
11 current plans, which calls for another -- as I  
12 mentioned, another kind of a landing craft that would  
13 work in that environment.  
14 Alternative two -- again, the impacts that  
15 were summarized for the land exchange with the southern  
16 road alignment -- and alternative three -- the land  
17 exchange and the central road alignment -- the impacts  
18 are very similar; a major beneficial effect, as you  
19 would expect, to public health and safety and  
20 transportation; the beneficial changes in the  
21 transportation options, patterns, and costs with a  
22 full-time service transportation link; and an increased  
23 opportunity for King Cove residents to travel to the  
24 Cold Bay Airport for access to medical services that are  
25 not available locally. They have a wonderful clinic in

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1 King Cove, but that doesn't handle all their needs.  
2 Major adverse effects to public use: Cultural  
3 resources, fish, and essential wildlife -- fish and  
4 essential fish habitat were identified as some of the  
5 adverse effects of the two road alternatives.  
6 Wilderness, as a -- considering the issue of  
7 wilderness, fragmentation of wilderness -- why sicken  
8 the wilderness with a road, basically -- would bring  
9 adverse effects to natural quality, undeveloped quality,  
10 and opportunities for solitude. And the beneficial  
11 effects of wilderness would be that over 44,000 acres of  
12 wilderness would be added to the Alaska Peninsula  
13 Refuge, which is currently State land.  
14 There would be major adverse effect on tundra  
15 swan, brant, Emperor goose, common loon populations; and  
16 a moderate effect on other breeding, migrating, and  
17 wintering birds. This is the conclusion of the draft  
18 EIS.  
19 The draft EIS also says that there would be  
20 adverse effect on caribou and bear, a potential for  
21 increased harvesting pressure on the fish in the  
22 streams. Mainly on the caribou. It's projected that it  
23 would -- could -- the road corridor could interfere with  
24 caribou migration patterns.  
25 The annual operation and maintenance costs

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1 would be about \$149,000 to \$158,000 for the roads -- one  
2 of the roads.  
3 Alternative four, hovercraft operations from  
4 Northeast Terminal to Cross Wind Cove, negligible to  
5 minor effects, except a major adverse effect to fiscal  
6 resources, as we've already shown; major beneficial  
7 effects to public health and safety; and moderate  
8 beneficial effects to transportation. The effects were  
9 generally related to the ongoing operations of the  
10 hovercraft and eventual conveyance of some 5,400 acres  
11 in the Izembek Wilderness to the King Cove Corporation,  
12 selected under ANCSA.  
13 Beneficial effects, no doubt, from regularly  
14 scheduled year-round transportation to the Cold Bay  
15 Airport and the availability of the hovercraft for most  
16 emergency medical evacuations. Adverse effects to  
17 wilderness from increased hovercraft operations;  
18 intermittent noise or visual disturbance; and eventual  
19 conveyance of 5,430 acres. The annual operation of  
20 maintenance cost of the hovercraft, estimated at  
21 \$2 million.  
22 And, finally, the Lenard Harbor alternative,  
23 similar to alternative four; major adverse effects to  
24 fiscal resources and major beneficial effects to public  
25 health and safety; moderate beneficial effects to

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1 transportation; and negligible to minor effects to other  
2 resource.  
3       Again, the beneficial effects resulting from  
4 regularly scheduled year-round transportation to the  
5 Cold Bay Airport and the availability of the ferry for  
6 emergency medical evacuations. Minor to moderate  
7 adverse effects to other resources. That would be  
8 construction of the Lenard Harbor ferry terminal and  
9 improvements to the Cold Bay docks and some disturbance  
10 due to ferry operations. Annual operation and  
11 maintenance cost, \$2.3 million.  
12       Okay. The public comment period is March 19th  
13 through May 18th. This is the first public meeting, as  
14 you can see, May 3rd. And then we're going from here to  
15 Sand Point, May 7th; Cold Bay, May 8th; Nelson Lagoon,  
16 May 9th; False Pass, May 9th; and King Cove on May 10th.  
17       You may e-mail in your comments, if you would,  
18 to izembek\_eis@fws.gov or fax them in, 907-786-3695  
19 [sic], or by mail, snail mail, to Stephanie Brady, who's  
20 the project team leader, U.S. Fish and Wildlife Service,  
21 1011 East Tudor Road, Mail Stop 231, that's Anchorage  
22 99503. And those addresses are also on the summary and  
23 a bunch of the other papers that were back there.  
24       And with that, the next step, we're going to  
25 review the public comments, prepare a comment analysis

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1 report, and respond to the public comments. That will  
2 take us through mid July. The final EIS will be  
3 generated from July through -- our target date is  
4 September, September 2012, and the final EIS to be  
5 issued October 2012. And then the record of decision  
6 would be late December of 2012.  
7       And for project updates, where we are, you can  
8 go to <http://izembek.fws.gov/eis> to stay informed on  
9 this. And that's it.  
10       We didn't -- as I said, I moved through it  
11 fast. You're not here to hear an employee talk. We  
12 want to hear from you. And when I last checked, we had  
13 about 30 people signed up. And just keep it moving.  
14 We'd like to hear from you. If you have any questions,  
15 now would be the time also.  
16       **JOAN KLUWE:** So we'll entertain a few  
17 questions first and then we'll switch to the public  
18 comment period. We'd like to keep public comments to  
19 three minutes or less, as Polly mentioned at the  
20 beginning. We'll start with questions.  
21       **JOHN DICKENS:** Ma'am, is there any estimate of  
22 how many people have died in King Cove waiting for  
23 medevacs since this has all gone on? Congressman  
24 Young's office said they know of 11 people that have  
25 died waiting for medevacs. I was wondering if you guys

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1 had any estimates on how many have died waiting for  
2 medevacs in King Cove during this period.  
3       **JOAN KLUWE:** The transportation section of the  
4 EIS and the health and safety section of the EIS does  
5 provide an analysis. There's not an analysis of deaths  
6 to date. There is an acknowledgment that there is a  
7 need for public transportation to the airport.  
8       **UNIDENTIFIED SPEAKER:** Is it my understanding,  
9 given what you just said, that alternative four is going  
10 to go away since the borough is taking the hovercraft  
11 out of service?  
12       **JOAN KLUWE:** The Aleutians East Borough sent a  
13 letter to the Fish and Wildlife Service indicating that  
14 the hovercraft would no longer be available for the  
15 route between King Cove and Cold Bay. That is correct.  
16       **UNIDENTIFIED SPEAKER:** But to follow that up,  
17 is that alternative going to be taken out of --  
18       **JOAN KLUWE:** Alternative four will be retained  
19 for analysis in the EIS, to the best of my understanding  
20 at this point. The Fish and Wildlife Service will make  
21 a final determination on alternatives at the conclusion  
22 of the public comment period based on public comments.  
23 But, at this point, it is being analyzed.  
24       **UNIDENTIFIED SPEAKER:** I didn't study this  
25 very closely, but I wanted to know the definition of

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1 "major effect" of tundra swans and Emperor geese. I  
2 mean, that seems to be the conclusion under alternative  
3 two and three, that there would be a major effect. Does  
4 that mean the birds wouldn't come? They would die?  
5 What does that mean?  
6       **JOAN KLUWE:** We have a very gross-level  
7 summary that has been presented to you tonight, and I do  
8 encourage you to take a look at the entirety of the EIS.  
9 The effects are analyzed in Chapter 4 of the EIS, and  
10 definitions are provided at the beginning.  
11       The effects to tundra swans relates to the --  
12 my recollection -- and, again, I'm sorry, I'm not a  
13 biologist -- but my recollection of that analysis is  
14 that there would be impacts to the breeding success of  
15 that species. So there is definitely more information  
16 on the analysis in the EIS.  
17       Do you guys have any better recollection?  
18       So we'll have to defer -- there is more in the  
19 summary as well. But the impacts in general are  
20 categorized as major, moderate, minor, negligible, or no  
21 impact. And so that was rated out as the highest level  
22 of rating to that species. And so, again, this is a  
23 very broad summary. Sorry I can't be more specific at  
24 this time.  
25       **UNIDENTIFIED SPEAKER:** Yeah, I did read a

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1 pretty fair amount of the full EIS, and I didn't see in  
2 there where you guys defined what the tundra swans --  
3 whether the study was based on proximity to a road or if  
4 your studies were based on historic -- seeing as how  
5 there have been roads there for like 50 years.  
6 Now, the breeding of those swans, was that  
7 study based on historic evidence of how swans reacted to  
8 the roads that are there or was that based on generic  
9 ecological literature on how they react to a road in  
10 general?  
11 **JOAN KLUWE:** The analysis is based on the  
12 location of the proposed road. And the analysis of  
13 impacts based on existing roads was considered. But  
14 there has not been a road that has completely crossed  
15 the Izembek Refuge before or the isthmus before.  
16 So it would be a new road. And the location  
17 of the breeding birds in juxtaposition to the location  
18 of the road, they estimated that there would be an  
19 effect to the tundra swans.  
20 **UNIDENTIFIED SPEAKER:** I noticed in the  
21 presentation that there was no reference to the King  
22 Cove Health and Safety Act of 1999. And I also noticed  
23 in the EIS, where it lists various laws that are germane  
24 to this issue, and that law is not listed in the list of  
25 laws. Now, it is discussed in the EIS, but it's not

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1 listed in the EIS as a law pertinent to this.  
2 And not having any history of that part of  
3 this puzzle is -- seems lacking, in my opinion, and  
4 downplays -- downplays the history of what's gone on on  
5 this issue for quite some time.  
6 **POLLY WHEELER:** And, again, just as a  
7 reminder, the point here tonight is to provide these  
8 types of comments so that we can then consider them in  
9 developing the final EIS, so I encourage everybody to --  
10 to keep track of these. I mean, we have a  
11 transcriptionist here. But if you want to provide  
12 written public comments; we've got verbal comments. But  
13 I really encourage you to include these types of  
14 comments in your comments so that they can be analyzed  
15 as part of the formal record and addressed in the final  
16 EIS.  
17 **UNIDENTIFIED SPEAKER:** So I hear a lot of  
18 discussion about analysis on the impact to tundra swan,  
19 to brant, to other wildlife, but it also sounds like --  
20 have you estimated the impact of death on humans over  
21 the life of the project? And if so, what estimated  
22 number of human deaths would occur without the road?  
23 Have you estimated that and is there an analysis of  
24 human death?  
25 **JOAN KLUWE:** There's not an estimate of

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1 analysis of human death. There is analysis of the  
2 transportation needs and the needs for public health and  
3 safety. And it is clearly demonstrated in the EIS that  
4 there is a need for public health and safety, but  
5 there's not an estimate of the number of people that  
6 will die, nor is there an estimate of the number of  
7 birds that will die. It's just not that specific.  
8 It is a gross-level -- it's a broad-level  
9 estimate, but the basic impact topic areas are covered,  
10 I believe. And if you disagree with how they're  
11 covered, please provide specific comment to that.  
12 At this point, unless there's any other  
13 clarifying questions, I would suggest that we move into  
14 the public comment period. This is the purpose of the  
15 meeting that we're here tonight, so that the Fish and  
16 Wildlife Service can hear your comments on the EIS.  
17 So unless there's any other clarifying  
18 questions, I suggest we move to the main point of the  
19 meeting, which is you being able to speak.  
20 So any other clarifying questions?  
21 All right. With that, then we will go by  
22 number order. We do request that you state your name.  
23 And if your name is not something like Smith or Jones,  
24 please spell your name so that the court reporter can  
25 capture it accurately.

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1 And then we will stick to the times for a  
2 public comment period. We'll have a timekeeper, and  
3 they can help to let you know when your time is getting  
4 close.  
5 So number one.  
6 **WENDY LOYA:** Can I sit?  
7 **JOAN KLUWE:** You can sit, stand. Please say  
8 your name first.  
9 **WENDY LOYA:** My name is Wendy Loya, L-o-y-a.  
10 And I'm here to speak on behalf of Friends of Alaska  
11 National Wildlife Refuges.  
12 The Friends group is an all-volunteer  
13 membership organization that works with the Fish and  
14 Wildlife Service to protect and enhance Alaska refuges  
15 primarily through education/outreach activities. Thank  
16 you for the opportunity to speak tonight.  
17 The proposed road from King Cove to Cold Bay  
18 would be extremely costly, damaging, and is unnecessary.  
19 In 1998, Senator Stevens negotiated an agreement with  
20 the City of King Cove and the Aleutians East Borough  
21 whereby Congress appropriated \$37.5 million to solve  
22 King Cove's medical and transportation needs. American  
23 taxpayers paid for an ultramodern medical clinic with  
24 telemedicine capabilities, improvements to the King Cove  
25 Airport, a 9-million-dollar state-of-the-art hovercraft,

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1 \$26 million for a 17-mile road and hovercraft port.  
2 This law specifically prohibited a road through  
3 Congressionally-designated Izembek Wilderness.  
4 The hovercraft safely and efficiently  
5 completed more than 32 medevacs to Cold Bay that  
6 averaged only 20 minutes per trip. The AEB mayor stated  
7 that the hovercraft is a lifesaving machine and is doing  
8 what it is supposed to. In spite of their medical needs  
9 having been met, AEB terminated the hovercraft operation  
10 in 2010, claiming it was too costly and unreliable.  
11 Their expensive lobbying effort persuaded  
12 Congress to authorize a proposed land exchange and a  
13 20-mile road through the wilderness. The law requires  
14 the Secretary of the Interior to determine if the road  
15 is in the public interest. We do not believe it is in  
16 the public interest.  
17 Several significant events have occurred in  
18 the last two years that make it clear that the road is  
19 not about affordable, reliable transportation or health  
20 and safety. First, the AEB has announced plans to use a  
21 hovercraft that would carry passengers and freight  
22 between Akun and Akutan across waters that experience  
23 more severe weather and seas than those that occur in  
24 Cold Bay. They would be transferring the hovercraft  
25 given to King Cove by the American taxpayers to Akutan.

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1 We quote an AEB memo dated December 5th, 2011:  
2 "We have developed a plan for the repair, installation  
3 of modifications and redeployment of the Suna-X in  
4 Akutan. The date by which we are expected to have the  
5 craft and crew ready for their first airport passenger  
6 run is September 1st, 2012." The AEB stated that they  
7 will pay the cost of operation of the hovercraft and run  
8 a deficit for at least five years, even though their  
9 main justification for the proposed road is that they  
10 cannot afford the cost of operating the hovercraft.  
11 Further, at the scoping meeting at Sand Point,  
12 the city manager of King Cove objected to the U.S. Fish  
13 and Wildlife presentation that stated that the purpose  
14 of the road was to meet health and safety concerns. He  
15 insisted that it be revised to state, "The people of  
16 King Cove believe that a road to Cold Bay is primarily  
17 for improved quality of life and access to the outside  
18 world for the residents of King Cove." This clearly  
19 indicates their real justification for the proposed road  
20 is for other purposes, such as personal travel and  
21 commercial interests.  
22 The Japanese-owned Peter Pan fish processing  
23 facility in King Cove is the largest in Alaska, and AEB  
24 has pursued a major marketing program to sell their  
25 goods elsewhere. It would be nearly impossible to

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1 regulate commercial use of the road, including hunting  
2 guides bringing sport hunters into the area, and  
3 ensuring that off-road vehicles do not leave the road  
4 and enter the designated wilderness.  
5 One very minor point is that, as mentioned in  
6 the revised alternative one, AEB has contacted the Army  
7 Corps of Engineers regarding using the passenger ferry  
8 and --  
9 **JOAN KLUWE:** Your time has passed.  
10 **WENDY LOYA:** Thank you.  
11 **JOAN KLUWE:** And you can submit the entirety  
12 of your comments to the court reporter. Thank you.  
13 Number two.  
14 **DAVID MCCARGO:** I'd appreciate it if you could  
15 sort of give me a thumbs-up 30 seconds short of my --  
16 **POLLY WHEELER:** I can do that.  
17 **DAVID MCCARGO:** My name is David McCargo.  
18 Last name is spelled M-c-C-a-r-g-o.  
19 As an Alaskan for about four years, I've been  
20 to King Cove and Cold Bay and Izembek. First and  
21 foremost, in my opinion, a 20-mile road would constitute  
22 a major intrusion into the refuge and threaten  
23 wilderness and wildlife values. Looking at the map, you  
24 can see that Izembek is shaped like a horseshoe with the  
25 road effectively bisecting the refuge, cutting it in

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1 half. Controlling off-road access to adjacent lands  
2 would virtually be impossible, with access being a major  
3 threat to the refuge's wilderness values. It's simply  
4 naive to think that once a road is built, that the  
5 locals will not drive off of it and otherwise impact  
6 adjacent lands.  
7 Furthermore, there's nothing to say that  
8 Congress in the blink of an eye can't loosen what weak  
9 protections are being assumed here. Any supposed  
10 guarantees that there would be access restrictions are  
11 untrustworthy, as evidenced by the opening of the Dalton  
12 Highway and adjacent lands for public access after an  
13 initial agreement was made in that case. Once the road  
14 is built, it can be expected that local communities,  
15 given the tradition, will push the door further open, as  
16 I've pointed out.  
17 The proposed land exchange, especially of this  
18 magnitude, would be a bad, if not horrible, precedent  
19 and the Congress made a serious mistake by kicking this  
20 ball to the Secretary. Wilderness is the highest level  
21 of public land protection and boundary tampering should  
22 be done with extreme caution, if at all.  
23 In my opinion, there should be only two  
24 criteria for modifying wilderness boundaries where a  
25 land exchange is involved: First, there should be an

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1 overwhelming preponderance of benefit to wilderness;  
2 and, two, where the failure to do so would result in  
3 unacceptable offsite impacts. Neither of these  
4 criterion are met in this instance. The history of land  
5 exchanges in Alaska have served conservation interests  
6 poorly, witness the Red Dog and Anaktuvuk land exchange,  
7 both of which I'm familiar with.

8 There is a general policy matter here. In  
9 addition to the moneys already spent without apparently  
10 anything to show for it and short of any shenanigans  
11 that apparently pertain to the diversion of the  
12 hovercraft, the larger issue is one of a sense of  
13 entitlement. We simply cannot pay for everybody to do  
14 anything. The country is bankrupt and we don't have the  
15 money, even if there is a perceived need to satisfy  
16 everybody's perceived needs. The proponents of these  
17 proposals often want somebody else to pay for it,  
18 especially the politicians, who have really no  
19 reservation about these things other than to get  
20 themselves reelected. And that's how this thing sort of  
21 got rolling.

22 Thank you very much. And I'll be submitting  
23 detailed comments in a letter.

24 **JOAN KLUWE:** If you have anything in writing,  
25 please provide them to the court reporter.

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1 **POLLY WHEELER:** Number three.  
2 **FRAN MAUER:** Thank you. My name is Fran  
3 Mauer. I'm here to speak on behalf of the Alaska  
4 Chapter of Wilderness Watch. Wilderness Watch is a  
5 national conservation organization whose primary mission  
6 is to advocate for the preservation and appropriate  
7 stewardship of our nation's National Wilderness  
8 Preservation System.

9 The presentation that was given earlier, the  
10 PowerPoint, the Izembek National Wildlife Refuge was  
11 established more than 50 years ago for the purpose of  
12 creating a refuge, breeding ground, and management area  
13 for all forms of wildlife. It was also -- it is also an  
14 exemplary wilderness and was recognized in 1980 when  
15 Congress designated 300,000 acres as wilderness.

16 Section two of the Wilderness Act explains the  
17 nation's interest in protecting wilderness qualities as  
18 follows: "In order to assure that an increasing  
19 population, occupied by expanding settlement and growing  
20 mechanization, does not occupy and modify all areas  
21 within the United States and its possessions, leaving no  
22 lands designated for preservation and protection of  
23 their national condition, is hereby declared to be the  
24 policy of the Congress to secure for the American people  
25 of present and future generations the benefits of an

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1 enduring resource of wilderness."  
2 To assure that this policy would be achieved,  
3 the Wilderness Act specifically stated, "There shall be  
4 no commercial enterprise, no permanent road, within  
5 wilderness areas designated by this Act."  
6 Given these powerful legal requirements, one  
7 has to ask, why are we here to consider a proposed land  
8 exchange and road corridor? Since passage of the  
9 Wilderness Act, history has shown that there have been  
10 several efforts to circumvent the Act by various  
11 commercial purposes. This case is no exception.

12 And it's a strategy on -- it's part of a  
13 growing list of land exchange schemes that have been  
14 developed to circumvent conservation laws, such as the  
15 Wilderness Act, and serve development interests within  
16 the national conservation areas in Alaska. The first  
17 one was the St. Matthew Island land exchange, which  
18 would have transferred lands -- wilderness category  
19 lands on St. Matthew Island to Native corporations that  
20 would then lease those lands to oil companies for an  
21 on-shore base to explore for oil in the Bering Sea.

22 There are several others of these land exchange schemes.  
23 I would like to add that the Izembek land  
24 exchange should be abandoned and dumped in the junkyard  
25 as failed Alaska land exchange schemes where it belongs.

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1 The proposed action, as proposed, would obliterate the  
2 integrity of the Izembek Wilderness, essentially,  
3 forever. It would inflict permanent irrefutable impacts  
4 to wildlife through habitat fragmentation, degradation,  
5 persistent impacts, et cetera. We recommend the  
6 no-action alternative, and I'd like to end with one last  
7 statement --

8 **JOAN KLUWE:** Sir, your time is up.  
9 **FRAN MAUER:** Okay. Thank you.  
10 Read the first sentence in the Wilderness Act.  
11 **JOAN KLUWE:** Sir, your time is over. Thank  
12 you.

13 **POLLY WHEELER:** Number three -- number four.  
14 **BETH PELUSO:** My name is Beth Peluso. It's  
15 P-e-l-u-s-o. And I represent Audubon Alaska, which is  
16 the state office of the National Audubon Society. We've  
17 had an Alaska office since 1977. And Audubon and our  
18 membership have been actively engaged in issues  
19 concerning the conservation of the important bird and  
20 wildlife habitat in Izembek for more than a decade.

21 Audubon Alaska supports alternative one, no  
22 action. Since 1997, Audubon has maintained that there  
23 are marine transportation options that would meet the  
24 concern for medical emergency transportation for the  
25 community of King Cove. When in service, the existing

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1 hovercraft system successfully completed more than 30  
2 medical emergency evacuations, proving that a marine  
3 option sufficiently addressed this problem without  
4 compromising the integrity of the Izembek Refuge.  
5       Since 1985, the U.S. Fish and Wildlife Service  
6 has consistently found that a road across the narrow  
7 isthmus between Izembek and Kinzarof Lagoon would be  
8 incompatible with the purpose for which the Izembek  
9 Refuge had been established and would cause significant  
10 long-term damage to important fish and wildlife habitat.  
11       Izembek and Kinzarof Lagoon, separated by a  
12 narrow isthmus, make up the ecological heart of Izembek  
13 Refuge. The refuge is known for its world-class  
14 waterfowl and shorebird populations and habitats,  
15 supporting hundreds of thousands of birds that migrate  
16 to the Lower 48 and to other continents. The lagoons'  
17 complex provides wintering, breeding, molting, or  
18 resting grounds for the following: Nearly the entire  
19 Pacific Coast population of brant, including birds from  
20 Canada, Russia, and Alaska; more than half the world's  
21 population of Emperor geese, which have a range limited  
22 to Alaska and parts of Russia; up to 70 percent of the  
23 world's population of Steller's eiders. The Alaska  
24 breeding population is listed as threatened on the  
25 Endangered Species Act; many species of other

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1 shorebirds, including Pacific golden-plovers, rock  
2 sandpipers, dunlins, and also a resident population of  
3 tundra swans. Many of the avian species using  
4 Izembek -- including dunlin, brant, and Steller's  
5 eider -- are recognized on Audubon's Alaska WatchList of  
6 declining and vulnerable bird populations.  
7       The isthmus between Izembek and Kinzarof  
8 Lagoon is the only path between the west and east sides  
9 of the refuge for such wide-ranging species as brown  
10 bear and caribou. Low levels of human disturbance have  
11 helped maintain the high habitat value of this area for  
12 brown bears.  
13       Construction and use of a road would impact a  
14 wide range of avian species year-round, with major  
15 effects on nearly the entire brant population of the  
16 Pacific flyway, more than half the global population of  
17 Emperor geese, and on tundra swan and common loons.  
18 Concern about impacts on subsistence harvest extends  
19 beyond the Izembek area to the Yukon-Kuskokwim Delta,  
20 where many Alaska Native residents are dependent on  
21 brant as a key subsistence resource. Negative effects  
22 of the road are compounded by the narrow isthmus, so it  
23 would be difficult for wildlife to avoid the road.  
24       The proposed exchange lands in alternatives  
25 two and three would not provide habitat comparable to or

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1 compensate for the loss or degradation of the  
2 Izembek-Kinzarof lagoons complex. Fundamentally, this  
3 is not an issue that can be resolved on the basis of  
4 acreage. No amount of exchange lands could compensate  
5 for the unacceptable and irreversible impacts of a road  
6 on globally significant and unique wildlife habitats.  
7       **POLLY WHEELER:** That's what I like to see.  
8       Number five.  
9       **GARY HENNIGH:** That would be me.  
10       Good evening. My name is Gary Hennigh,  
11 H-e-n-n-i-g-h. This is my 23rd year working for the  
12 City of King Cove as the city manager. It's a great  
13 community I have the honor of working for. I've already  
14 heard some statements tonight giving credit for things  
15 that I don't have a clue what they're talking about.  
16       I have a lot to say, but I'm going to keep  
17 most of it to myself and express it in written comments  
18 or at the public meetings next week out in the region.  
19 I would say at this time my primary focus is to make  
20 sure that the King Cove group, which includes the  
21 Aleutians East Borough, the Agdaagux Tribe in King Cove,  
22 the Belkofski Native Council, the King Cove Corporation,  
23 and the City of King Cove, have the necessary resources  
24 and expertise to do everything possible to help the  
25 service make the final EIS as fair, factual, and honest

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1 as possible.  
2       And given the current status of the EIS, this  
3 is a challenge. This DEIS is substandard, biased in  
4 many cases, either scientifically or factually  
5 incomplete or inadequate. It is not fair for the  
6 residents of King Cove in the Izembek region and the  
7 American public for the Secretary of the Interior to use  
8 this document as it is to make this public interest  
9 finding as the final decision to this land exchange and  
10 road decision. So instead of excessively whining on  
11 this concern, we are focused on helping the federal  
12 government make the EIS a respectable process and  
13 document.  
14       I must also comment that being listed as a  
15 cooperating agency needs to be taken with a grain of  
16 salt. The service knows that the cooperating agencies  
17 were not involved in all those bogus impact evaluations  
18 that they are talking about, and we are very upset about  
19 being excluded from that process.  
20       I also learned to better tolerate simply by  
21 ignoring those who oppose the land exchange or any array  
22 of environmentally hyped-up statements, some like I've  
23 heard here tonight.  
24       I have directly heard respectful scientists  
25 testify in Congress that there is no room for compromise

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1 between Izembek, black brant, and the Aleuts of King  
2 Cove on this issue. That's a very sad statement.  
3        Anyhow, I'm just going to leave it at that.  
4 All I can say is -- to all of us -- the truth does  
5 matter. And if you want to make your statements, you've  
6 got to have the scientific facts to back them up. Some  
7 of what I've read in the paper recently and have heard  
8 are not scientific facts that can be backed up.  
9        You have not heard the last from the City of  
10 King Cove and its 900 residents. Thank you.  
11        **HENRY MACK:** Good evening. My name is Henry  
12 Mack, and I'm the mayor of King Cove. I am also a  
13 grandfather, a father, a King Cove Corporation  
14 shareholder, a tribal member, and an Aleut. Tonight I'm  
15 here on behalf of my community.  
16        Mr. Kinzarof, along with many other Native  
17 folks, lived in the Izembek isthmus prior to 1960 when  
18 the service came and made it a refuge. Not one of those  
19 families was ever contacted, the Kinzarofs, the  
20 Nevzaroffs, the Dushkins, the Kuzakins, the Samuelsons,  
21 the Goulds, that we're going to come and we're going to  
22 take this piece of property that you folks are hunting  
23 on and living and we're going to burn your cabins down,  
24 which they did. Not one of those folks. There's 100  
25 Kinzarofs there in my community today and Nevzaroffs and

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1 Dushkins, and Kuzakins that lived off this land. Not  
2 one of them were asked, we're going to come and change  
3 your land.  
4        And this forum that you folks are in today is  
5 a forum that they were denied. And it just hurts us  
6 that the service has done that to us. I have more here  
7 to say, but I'm going to turn it in. Thank you.  
8        **JOHN DICKENS:** Since it's so easy to go over,  
9 I brought my stopwatch. Okay. I'm starting.  
10        My name is John Arnold Dickens, and I came  
11 here from Bethel because -- at the request of my wife,  
12 who's an Eskimo, and her family. We wanted to convey  
13 the solidarity that the people of the Yukon-Kuskokwim  
14 Delta feel for the people of King Cove and support them  
15 in their struggle for the safety of human life.  
16        I'm a volunteer fireman. I've been a first  
17 responder for over 30 years. I'll tell you, it's really  
18 sad when you're in a Bush clinic and you run out of  
19 oxygen and your patient is going to die. We asked a  
20 legitimate question: How many people in King Cove have  
21 died waiting for a medevac? Now, Don Young's office  
22 said they know of at least 11. I suspect there are many  
23 more.  
24        Also, how many tears have been shed, how much  
25 blood had been spilt, by these good people whose land

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1 was taken away from them? This isn't just about King  
2 Cove. This is about all of rural Alaska.  
3        You know, a lot of people in the Fish and  
4 Wildlife Service that I meet are really nice people.  
5 They don't seem to be racist. They don't seem to be  
6 fascists. Yet the results of their activities are often  
7 perceived that way by Alaska Native people.  
8        I ask you green-peacer types here tonight, if  
9 it was your family member that was suffering, I bet  
10 you'd have a different tune. If it was your family  
11 member that died waiting for a medevac, you would have a  
12 lot different tune. I'm sorry, I know you mean well,  
13 but I see a lot of hypocrisy in your statements.  
14        My wife and I have driven the haul road  
15 several times on vacation. I looked for the  
16 environmental holocaust when I got to Deadhorse.  
17 Couldn't find it. I guess they put it away because they  
18 heard I was coming.  
19        You know, we live in Bethel, the biggest city  
20 in the Bush, inside of YKNWR, and we have the same  
21 problems. We have people get shot seven miles away.  
22 The air ambulance is up on another shooting, we might as  
23 well be on the dark side of the moon for us to get  
24 there. Human life is precious.  
25        I have been to the Izembek Wildlife Refuge

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1 many times in the Coast Guard and working for NOAA. And  
2 I must respectfully disagree that this road would be the  
3 end of the world, because that is not true. It wasn't  
4 true when there was a giant base at Cold Bay and it's  
5 not true now.  
6        I ask you a question, my friends, how many  
7 good people are going to die? How many tears are going  
8 to be shed? How many people are going to suffer  
9 needlessly before this road is built? It must be built.  
10 It must be built now. And the Fish and Wildlife Service  
11 should hang its head in shame for resisting this road  
12 and stalling. We all are going to die, but I sure hope  
13 none of you have to suffer needlessly like the people in  
14 King Cove have. Thank you.  
15        **CARL PORTMAN:** Good evening. My name is Carl  
16 Portman. I'm the deputy director of the Resource  
17 Development Council. RDC is here tonight to support a  
18 proposed land exchange.  
19        Although there is no industry that would  
20 benefit from a land exchange, RDC supports the proposed  
21 action because it is the right thing to do. For over a  
22 decade we have consistently advocated for a road link  
23 between King Cove and Cold Bay. RDC strongly believes  
24 that a road corridor from King Cove to the all-weather  
25 airport at Cold Bay is in the public interest.

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1 In our view, this is a public safety and human  
2 rights issue, which should be given the highest  
3 priority. Specifically, RDC supports alternative two  
4 and encourages the Corps of Engineers and Fish and  
5 Wildlife Service to adopt this option as the preferred  
6 alternative. This alternative would provide safe,  
7 reliable, and affordable transportation for King Cove  
8 residents.

9 Clearly, the land exchange outlined in the  
10 DEIS would provide a net gain for the National Wildlife  
11 Refuge System while providing a vital public health and  
12 safety corridor for King Cove residents. The road would  
13 be narrow and unobtrusive. It would be used primarily  
14 for health and safety purposes and would be closed to  
15 commercial traffic. Mitigation strategies will allow  
16 the road, the environment, and wildlife to coexist.

17 There is adequate existing information to  
18 allow for a final EIS to proceed, a record of decision  
19 issued, and for the Secretary of the Interior to make a  
20 public interest finding that meets the intent of  
21 Congress and of course equitable treatment for the Aleut  
22 people.

23 The road would solve the community's perennial  
24 problem with access to the outside world, especially in  
25 poor weather conditions. The proposed land exchange

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1 would provide for a long-term, safe, and reliable  
2 year-round transportation system between King Cove and  
3 Cold Bay. The marine life between the two communities  
4 has not solved King Cove's transportation challenges in  
5 reaching Cold Bay and its airport. The community has  
6 not found the hovercraft to be an effective solution to  
7 their problems, which is why King Cove and tribal  
8 leaders are united in their support of a road link.

9 Affordable, reliable, and practical  
10 transportation is not available to King Cove residents.  
11 Air transportation is limited by weather, availability  
12 of aircraft, and the topography constraints of the King  
13 Cove Airport. Cost for the air travel is also an issue  
14 for many residents. The hovercraft has proven expensive  
15 and more difficult to keep in service than originally  
16 expected. That option was attempted in good faith, but  
17 it has now been shut down. The road has always been the  
18 community's first choice because it provides residents  
19 with the greatest amount of security.

20 The King Cove Corporation is giving up  
21 20 percent of its land for a single-lane gravel road.  
22 That demonstrates how much of a priority emergency  
23 access to the airport in Cold Bay is to local residents.  
24 Residents of King Cove have been waiting for over 20  
25 years to build a service transportation link to the

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1 airport, and the proposed action is a big step in the  
2 right direction. Thank you.

3 **POLLY WHEELER:** Number nine.  
4 **ED FOGELS:** Thank you. For the record, my  
5 name is Ed Fogels. I'm the deputy commissioner of the  
6 Alaska Department of Natural Resources. Last name is  
7 spelled F-o-g-e-l-s.

8 On behalf of the State of Alaska, I'm here to  
9 express the governor's support for a land exchange to  
10 construct a road connecting the cities of King Cove and  
11 Cold Bay.

12 Access to the Cold Bay Airport for the  
13 residents of King Cove has been a longstanding struggle  
14 as the community continues to fight for an improved  
15 quality of life. The City of King Cove's decades of  
16 perseverance and determination to get this road built  
17 speaks volumes to their character and strength, and the  
18 State of Alaska stands with you and applauds your  
19 resilience.

20 A road linking the City of King Cove to Cold  
21 Bay Airport would provide safe and dependable  
22 transportation to emergency health services in crisis  
23 situations, which is most often complicated by harsh  
24 weather conditions limiting other modes of  
25 transportation.

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1 The current situation for King Cove residents  
2 is life-threatening, and this EIS is taking a critical  
3 step towards providing the infrastructure needs of this  
4 community. The importance of this project to the State  
5 of Alaska and the local residents is evident by the  
6 unprecedented 50,000 acres of land the State of Alaska  
7 and the King Cove Corporation is willing to exchange for  
8 a 206-acre road corridor to Cold Bay. For the 131 acres  
9 of land that will be removed from the wilderness  
10 designation, 44,000 acres will replace it and become  
11 designated the Alaska Peninsula National Wildlife Refuge  
12 Wilderness.

13 In good faith, residents have fought for and  
14 have implemented other non-road options to improve  
15 health services in the area. Unfortunately, those  
16 efforts have not proved to be feasible or economical;  
17 therefore, the only viable option to resolving this  
18 longstanding problem is to build the road.

19 I would like to encourage Alaskans to get  
20 involved, express your opinions about why a road is  
21 needed to protect the residents of King Cove. Thank you  
22 very much.

23 **POLLY WHEELER:** If I could remind people that  
24 if they have written testimony, if you could leave it up  
25 here. You can also submit your comments through the

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1 various means that we listed earlier. But if you have  
2 written comments, if you can leave them up there, we'd  
3 appreciate it.  
4 **ED FOGELS:** We'll submit some later.  
5 **POLLY WHEELER:** Okay. Thank you.  
6 **JOAN KLUWE:** Whatever you presented tonight  
7 will help the court reporter with the transcription,  
8 though. If you have any written comments, it would be  
9 very --  
10 **POLLY WHEELER:** Yeah. She's doing her best,  
11 and I'm sure she's going to catch everything, but  
12 there's always those little words here and there that  
13 are problematic. So if you have written testimony, if  
14 you can provide it to her, that would be great.  
15 Number ten.  
16 **DAN ROWLEY:** I would like to just hand my  
17 comments in and yield my time to number 11.  
18 **POLLY WHEELER:** Duly noted.  
19 Number 11.  
20 **DELLA TRUMBLE:** Good evening. My name is  
21 Della Trumble. Some of you don't know me. I've been  
22 involved in this road issue for the majority of my life.  
23 Trust me, this has been a very long road.  
24 Today, you know, we're all here for a very  
25 good reason. You understand why we're here, many of

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1 you, because of the same transportation issue between  
2 King Cove and Cold Bay. Congress directed the Secretary  
3 of the Interior to prepare an environmental impact  
4 statement under the National Environmental Policy Act  
5 and conduct an analysis of a proposed land exchange  
6 among the State of Alaska and the King Cove Corporation  
7 in the potential construction and operation of a road  
8 between the communities of King Cove and Cold Bay, and  
9 that is why we are here.  
10 That also requires that the EIS contain an  
11 evaluation of a specific road corridor through the  
12 refuge that is identified in consultation with the  
13 State, the city, the tribe. And the Secretary of the  
14 Interior delegated the coordination of this EIS to Fish  
15 and Wildlife. We all know that. That's why we're here.  
16 Imagine my reaction when a friend shared with  
17 me recently, conservation organizations have been making  
18 great strides for recognizing that protected areas must  
19 respect the rights of indigenous people as enshrined in  
20 international law, including the right to give or  
21 withhold their free, prior, and informed consent to the  
22 establishment of new protected areas in their customary  
23 territories. Yet, in practice, these organizations  
24 often continue to exclude local people from using  
25 forests and other resources.

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1 Imagine if the federal government about four  
2 years earlier had contacted us and asked us when they  
3 drew those wilderness boundaries. We would not be here  
4 today. We would have this road. We would not have lost  
5 the lives that we have or contributed to the health of  
6 many of the people in our community.  
7 For over 15 years I've sat through hours of  
8 testimony by road opponents. I've heard about the  
9 dangerous precedent, the blow to the heart of the  
10 wilderness, a scar on a world-class refuge. And in one  
11 particular instance, after that House hearing, we  
12 were -- a comment was made, this is like cutting a baby  
13 in half, referring to the area between the two lagoons,  
14 when we are trying to save the lives of babies.  
15 I'm here to testify to the terrible example  
16 already set by the federal officials who failed  
17 completely to consult with us when this refuge was  
18 created. And I'm here to testify that no refuge would  
19 have ever been possible without the ways of the Aleut  
20 people who walked lightly on these lands.  
21 People in King Cove have lived this road issue  
22 for way too many years of our lives, and we continue to  
23 stand back and watch the hardship and the lives that are  
24 put in jeopardy day by day. And, at this point, enough  
25 is enough. I thought when the Izembek land exchange

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1 passed that we were truly on our way to make this  
2 happen. Now three years later we are here once again to  
3 testify again to all the communities. Time after time  
4 after time the people have been put through this.  
5 I ask why a conservation group stated that the  
6 value of the land that we are giving up are not enough  
7 when the State and the King Cove Corporation are putting  
8 up over 60,000 acres of land? I ask why a conservation  
9 group comes to the King Cove Corporation to purchase  
10 Mortensens Lagoon to give to the Fish and Wildlife? How  
11 do you say that the lands we're giving up are not enough  
12 when they are adjacent to the wilderness areas? The  
13 lands we're giving up, the 5,400 acres, include the hot  
14 spring areas.  
15 We will not stand silent for this. There is  
16 no reason why we cannot work together to make this work,  
17 and we will continue this fight for as long as it takes  
18 to get a road between these two communities. For the  
19 well-being of the people in King Cove, we have given up  
20 enough. And what have you given? What have you given?  
21 Thank you.  
22 **POLLY WHEELER:** Number 12.  
23 **JENIFER SAMUELSON-NELSON:** Good evening. My  
24 name is Jenifer Samuelson-Nelson, and I'm here on behalf  
25 of the Aleut Corporation. And I thank you for the

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1 opportunity to testify tonight.  
2 Also on behalf of the Aleut Corporation. But  
3 I was raised in King Cove and now live here in  
4 Anchorage. I serve as the vice chairman of the board  
5 for the Aleut Corporation, the chair of the shareholder  
6 affairs committee. I'm also a King Cove Corporation  
7 shareholder, as well as an Agdaagux tribal member.  
8 I, like many others you'll hear from tonight,  
9 have had my share of turbulent flights, seasick boat  
10 rides, and have felt the anguish when loved ones have  
11 been denied access to urgent medical care due to a lack  
12 of reliable transportation or when people with medical  
13 conditions can't go to King Cove to visit family or are  
14 forced to leave the community they live in because there  
15 is not a reliable means of transportation for them to  
16 get out.  
17 When I was about four months pregnant with my  
18 twin daughters, I asked my doctor, you know, "Can I  
19 travel?"  
20 She was like, "Oh, yeah. Go ahead." She's  
21 like, "Where are you going to go?"  
22 I said, "King Cove."  
23 She goes, "No. You can't." She said, "I've  
24 been waiting for a patient from there for ten days.  
25 There's no way you can go there."

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1 So being told from my own doctor that I was  
2 forbid to go he home to visit my family was pretty  
3 heart-wrenching.  
4 As we all know, the road from King Cove to  
5 Cold Bay has been an issue for decades. The Land  
6 Exchange Act in 2009, the King Cove Corporation, the  
7 State of Alaska, proposed over 60,000 acres in exchange  
8 for 206 acres, on which to construct a single-lane  
9 gravel road. Although at face value this may not seem  
10 like an equitable trade, the 200 acres really represents  
11 the missing link needed to allow transportation between  
12 King Cove and the Cold Bay Airport.  
13 I'll share a few points, but then I'll sit  
14 down to allow others to -- time to share their thoughts.  
15 We all agree that it's tough to get in and out of King  
16 Cove. There's no air service at night due to local  
17 topography and weather. A road is a simple,  
18 uncomplicated solution to a very real need and a large  
19 problem. And other more complicated expensive solutions  
20 have been tried, such as the hovercraft at a cost of  
21 over \$1 million per year.  
22 We feel that alternative two in the EIS is the  
23 preferred group that would provide safe, reliable, and  
24 affordable transportation between the City of King Cove  
25 and the Cold Bay Airport. Alternative two would result

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1 in a construction of a 19-mile long, all-weather gravel  
2 road on 227 acres of land. However, we also would  
3 support any of the options as long as it results in a  
4 road built that connects the communities, and that is  
5 our goal. Thank you.  
6 **POLLY WHEELER:** Okay. Number 13.  
7 **ADAM BERG:** Hi. My name is Adam Berg. The  
8 last name, B-e-r-g. Under your -- just passing on a  
9 brief comment from my boss, Representative Bryce Edgmon.  
10 He's the State representative for the King Cove/Cold Bay  
11 area.  
12 And here it is: As the State representative  
13 who sponsored the legislation confirming Alaska's  
14 agreement to the land exchange authorized by Congress, I  
15 would like to encourage U.S. Fish and Wildlife Service  
16 and the Army Corps of Engineers to select either  
17 alternative two or three as outlined in your draft EIS.  
18 The intent of both Congress and Alaska is to  
19 permit the construction of a road across a small area of  
20 the refuge in order to establish a safe and reliable  
21 transportation route between King Cove and the Cold Bay  
22 Airport. The focus has always been on improving health  
23 and safety for King Cove residents who again and again  
24 have been cut off from Cold Bay's airport during medical  
25 emergencies.

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1 The comprehensive information in the EIS shows  
2 the land exchange as tens of thousands of acres of  
3 pristine fish, waterfowl, caribou, brown bear, and  
4 endangered species habitat to the refuge. This study  
5 reaffirms my conviction that the major health and safety  
6 benefits that a single-lane road will bring to the  
7 nearly thousand residents of King Cove will far outweigh  
8 its limited environmental impacts.  
9 **POLLY WHEELER:** Number 14.  
10 **THERESA FIORINO:** Thank you for the  
11 opportunity to comment on the proposed land exchange and  
12 road corridor through Izembek National Wildlife Refuge.  
13 My name is Theresa Fiorino, F-i-o-r-i-n-o, and I am the  
14 Alaska representative for Defenders of Wildlife.  
15 Defenders have long been involved in this  
16 issue for more than a decade. We strongly oppose the  
17 land exchange and road corridor through Izembek Refuge,  
18 as these actions would set a harmful precedent for  
19 public lands, damage the ecosystem, and cost taxpayers  
20 millions of dollars.  
21 The proposal to build a road through a  
22 designated wilderness area within Izembek requires an  
23 exchange of land that would remove not only the area's  
24 classification as a National Wildlife Refuge, but also  
25 its wilderness designation. Besides eroding the

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1 effectiveness of the Wilderness Act, the additional  
2 acres offered by the State of Alaska and the King Cove  
3 Corporation under the exchange are ecologically inferior  
4 to those that would be lost and, therefore, provide no  
5 net benefit to the refuge.  
6       Designated as a Wetland of International  
7 Significance under the Ramsar Convention, Izembek Refuge  
8 is home to one of the largest eelgrass beds in the  
9 world. These beds support abundant plant, animal, and  
10 sea life on and around the refuge, including hundreds of  
11 thousands of waterfowl.  
12       The proposed road corridor cuts through  
13 sensitive terrain that would make road building costly  
14 and difficult and potentially dangerous to drive due to  
15 the region's extreme weather. The isthmus along which  
16 the road would be constructed is dotted with hundreds of  
17 wetlands and depressions.  
18       In the best of weather, travel to Cold Bay by  
19 this road would take an hour and a half. But high winds  
20 are common throughout the year and in winter snow  
21 blowing from wetland depressions will not only further  
22 increase maintenance costs, but will make the road  
23 extremely dangerous for travelers.  
24       Constructing and maintaining this road would  
25 cost the State and federal taxpayers millions of

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1 dollars. The road's development continues to be pursued  
2 despite there already being a transportation system that  
3 has been proven safe and effective. In 1998, U.S.  
4 taxpayers paved \$37.5 million to improve King Cove's  
5 medical facilities, build a connecting road from the  
6 village to a new marine terminal, and purchased a  
7 state-of-the-art 9-million-dollar hovercraft. The  
8 hovercraft is capable of transporting an ambulance to  
9 Cold Bay in as soon as 20 minutes and has been proven  
10 successful in all medical evacuations for which it has  
11 been used.  
12       Despite its success, the AEB suspended  
13 hovercraft service between King Cove and Cold Bay in  
14 2010. However, AEB has plans to move this hovercraft  
15 for use between Akutan and an airport on Akutan [sic]  
16 Island, and has committed to paying for its operation  
17 there for the next 20 years. AEB's preparations for  
18 this transfer also include the addition of de-icing  
19 equipment. Given that the problems that led the AEB to  
20 halt the hovercraft's service for King Cove have been  
21 resolved, it appears that the need for an alternative  
22 form of transportation no longer exists.  
23       Pursuing the proposed road and land exchange  
24 would remove a unique and fragile area from the public  
25 conservation estate and subject it to degradation that

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1 goes along with construction and increased motorized use  
2 and repeated maintenance of the road.  
3       **POLLY WHEELER:** Number 15.  
4       **BARBARA WINKLEY:** My name is Barbara Winkley,  
5 and I'm a 45-year resident of Alaska. And I would just  
6 like to make a couple of comments.  
7       This critical wildlife habitat of eelgrass  
8 beds of Izembek Lagoon and surrounding areas for the  
9 migrating brant and other migrating waterfowl is even  
10 more critical today than when it was studied and  
11 declared a wildlife refuge in the early '70s.  
12       As wildlife habitat areas diminish in North  
13 America, we need to protect the wildlife refuges  
14 established under the Wilderness Act of 1964. I urge  
15 you not to bisect this contiguous wilderness area, which  
16 gives refuge and a food source to marine mammals, such  
17 as otters and Steller sea lions in the surrounding  
18 inlets, as well as the protected, undisturbed resting  
19 place and food source for migrating waterfowl.  
20       The 20-minute hovercraft trip between Cold Bay  
21 and King Cove, put in place in 1998, is a much shorter  
22 time than it would take to drive a patient over a rough  
23 expensive road. I testify today to oppose the  
24 construction of this unnecessary road.  
25       **THE REPORTER:** Can I have your name again?

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1       **BARBARA WINKLEY:** Barbara Winkley,  
2 W-i-n-k-l-e-y.  
3       **POLLY WHEELER:** Sixteen.  
4       **MICHAEL CHRISTENSEN:** My name is Michael  
5 Christensen. That's spelled Christ-e-n-s-e-n. I'm the  
6 executive director of Eastern Aleutian Tribes, the CEO  
7 of the organization responsible for health care in both  
8 Cold Bay and King Cove.  
9       I want to first let everyone, including the  
10 Secretary, know that on Tuesday this week the tribal  
11 health directors of the State of Alaska unanimously  
12 voted in favor of a road for the health of the people in  
13 King Cove. On Wednesday, the Alaska Native Health  
14 Board, responsible for all health care for tribal health  
15 in the state, voted unanimously in support of a road  
16 from King Cove to Cold Bay, indicating that they have  
17 strong support for continued saving of life by utilizing  
18 a road.  
19       I also have with me letters from the medical  
20 director, who is responsible, particularly, for the King  
21 Cove Clinic, Dr. Cotten, and the doctor who is assigned  
22 to the clinic in King Cove, who also wanted to be here,  
23 but both of them are providing health care. They asked  
24 that we read their letters. And in three minutes, that  
25 would be impossible, so I want to read just some

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1 highlights from those two letters.  
2       The first, which comes from Elizabeth Clawson,  
3 who is the physician in charge of the clinic in King  
4 Cove, indicates, "I think the road from King Cove to  
5 Cold Bay is a complete medical necessity, particularly  
6 since the road is only to be used for emergency/medical  
7 travel and not for private use. That means the road  
8 cannot be used for individual financial gain.  
9       "Currently the King Cove Clinic is  
10 well-equipped with personnel and supplies. The clinic  
11 is not equipped to handle continuing care for lengthy  
12 treatment of any patient, nor are there providers."  
13       I want to read now a statement from  
14 Dr. Cotten's letter. She says, "I am writing to  
15 encourage you to take a proactive stance on the King  
16 Cove to Cold Bay road. The road would be a major step  
17 towards ensuring safety and best possible care for the  
18 village residents of King Cove."  
19       She says, "On average, we lose one to two  
20 patients a year due to transfer delays. We have lost  
21 children and adults. We have had pregnancy disasters  
22 and major trauma. We have a challenge keeping health  
23 care providers in a stressful environment." She goes on  
24 to give an example of her own experience where she  
25 nearly lost her life in the last medevac she

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1 participated in.  
2       On behalf of the health care providers and  
3 those responsible, we strongly encourage that human life  
4 be considered and a road be allowed. Thank you.  
5       **POLLY WHEELER:** Seventeen.  
6       **BETTY SMITH:** My name is Betty Smith, and I'm  
7 here for myself. I was a resident for a time in Cold  
8 Bay. And you would have to be deaf and blind and  
9 heartless not to recognize the terrible situation the  
10 residents of King Cove find themselves when they're  
11 unable to travel back and forth to their village.  
12       I have seen emaciated people in the airport  
13 that I would be shocked to know that they survived. I  
14 have had people come to my house when they had to stay  
15 overnight in the airport for days because a boat could  
16 not come into Cold Bay to pick them up.  
17       And it is ridiculous to think that a narrow  
18 road across the Izembek Refuge is going to affect  
19 wildlife in any way. God gave bear and caribou legs.  
20 They can walk right across it like they do all the other  
21 roads. They gave birds wings -- God gave birds wings.  
22 I have seen millions, it seems, hundreds, thousands of  
23 birds fly across the bay and up over the edge of the  
24 bay. They don't crash into anything. They just keep  
25 going. There's a huge refuge there. They will find a

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1 place to nest and breed.  
2       And the time that I spent in Cold Bay, I did  
3 not insure my car because every time I drove it, I never  
4 saw maybe one other car maybe really close to the store.  
5 It just was ridiculous to think that you would ever meet  
6 another car on the road. So how can that one car that  
7 might travel between King Cove and Cold Bay affect  
8 anything? It's just ridiculous.  
9       And I just am here mainly to say, I wrote to  
10 Clinton, President Clinton, in -- years ago. And to  
11 find out last week that this road doesn't exist, it --  
12 it just amazed me that we have waited this long to give  
13 people a road that they need.  
14       **POLLY WHEELER:** Eighteen.  
15       **BETHANY MARCUM:** Bethany Marcum, M-a-r-c-u-m.  
16 And I'm just here to speak in support of alternative  
17 numbers two and three in terms of building a road, both  
18 for the health and safety reasons that have been cited.  
19       One other person earlier mentioned the cost  
20 concerns. And you can see by the analysis that the cost  
21 of the other alternatives in the long run will certainly  
22 within 20 years or so exceed -- meet and then continue  
23 to exceed the cost of the initial outlay for the road.  
24 So the road in the long run is actually going to be a  
25 better fiscal consideration.

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1       But the other thing is, that's the main  
2 purpose of our government, is to provide infrastructure  
3 so that our citizens have the ability to get the health  
4 and safety that they're supposed to be provided by our  
5 government. That is what the government is supposed to  
6 be spending money for, not many of these other programs  
7 that they're spending it for. So let's make sure that  
8 we invest the money in the proper things, the  
9 infrastructure that will last, that will allow our  
10 citizens to have the health and safety they deserve.  
11       **SAM COTTEN:** My name is Sam Cotten. And in  
12 the interest of full disclosure, I used to be an  
13 employee of the Aleutians East Borough and currently  
14 have a contractual relationship with them as a fisheries  
15 consultant.  
16       The road to Cold Bay should be an easy  
17 decision. In my opinion, there's no significant impact  
18 on the habitat, no loss of eelgrass. The birds and  
19 animals are used to people and vehicles, as evidenced by  
20 the existing roads, activities, and hunting that  
21 currently takes place in and around Cold Bay.  
22       And a lot of that is by folks from Anchorage  
23 and other parts of the United States who have a lot  
24 easier and safer access to the area than the people in  
25 King Cove. So what's the problem?

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1 In my opinion, the land is designated as  
2 wilderness and is in a National Wildlife Refuge, a  
3 designation similar to the Arctic Refuge. My feeling is  
4 that there's a concern about precedent -- and I've heard  
5 that mentioned here many times tonight -- and that  
6 shouldn't be a reason when the merits and the logic are  
7 overwhelmingly on the side of the road.  
8 You've heard about the merits, including the  
9 health and safety issues, as well as the convenience for  
10 the residents of King Cove. The people living there  
11 feel strongly about this and with good reason.  
12 Mr. Christensen mentioned my wife earlier. I  
13 was going to say something, too, though. She works in  
14 King Cove obviously and has some written testimony. One  
15 point she had really struck home with me. She related  
16 an incident where a patient needed to leave King Cove  
17 and the weather was terrible, but the pilot was willing  
18 to fly anywhere. He was willing to take a risk. It was  
19 a terrible night. And he said he just felt it wasn't  
20 his time to die. Luckily, they made it to Cold Bay.  
21 Her point was, you shouldn't have to rely on luck to get  
22 safe access to Cold Bay Airport in a medical emergency,  
23 or for that matter any reason.  
24 I wasn't sure I was going to talk about my  
25 friend Ruth Croxton. But I met her in college at the

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1 University of Alaska Fairbanks many years ago. She  
2 became a pilot, flew the King Cove route. She died  
3 there.  
4 And sometimes I've -- I've been on flights  
5 where you're sort of white-knuckling and you're flying  
6 sideways next to the mountain to stay out of the middle  
7 of the pass where all the real wind is, and I think --  
8 and the pilot, that day that was really terrible, we  
9 were flying sideways. He said he would have never done  
10 that, but -- had he known the weather was going to be  
11 that bad. But there's just no way to know. It can come  
12 up pretty quick and you're already in the air and it can  
13 be bad.  
14 Thirty seconds. Okay.  
15 So I'll conclude by saying the reluctance of  
16 the United States government to allow this road is a  
17 good example of a bad decision to presume a one-size-all  
18 land designation should trump the logic and merits of  
19 this particular project.  
20 And I just wanted to say that I heard a few  
21 things tonight that I guess I haven't been exposed to.  
22 Some of the people have been following this issue for a  
23 long time. But to think that this is a shenanigan or a  
24 scheme or a strategy to circumvent the Wilderness Act, I  
25 couldn't believe what I was hearing. Thank you.

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1 **POLLY WHEELER:** Twenty.  
2 **WADE WILLIS:** My name is Wade Willis,  
3 W-i-l-l-i-s. I'm here to speak as a former resident of  
4 Cold Bay, a hunter in Cold Bay, and somebody who  
5 believes in preserving Alaska with the standards that  
6 we've enjoyed since statehood.  
7 I'm astonished to hear that this is an issue  
8 of quality of life for Cold Bay -- King Cove. Every  
9 rural village in this state suffers the exact same thing  
10 that you guys are suffering, every single one. They all  
11 do. Some worse maybe. Some are more remote.  
12 False Pass, Nelson Lagoon, where are they?  
13 Why are they not here going, "Oh, well, if King Cove  
14 gets a road, by golly, we've got to have something  
15 special, too, because we suffer too. When is the spur  
16 going to go up to Nelson Lagoon?"  
17 And the State comes and says, "We promise  
18 we're not going to have commercial use of that road,"  
19 but we all know that once it becomes State land, it's a  
20 given it's going to be commercial use, because the State  
21 will call the shots and the State always goes with  
22 commercial use. And a road to that side of the  
23 peninsula is highly beneficial for commercial use.  
24 And I also say, when did quality of life mean  
25 that the quality of life for caribou, black brants, and

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1 all the wildlife that the Native people have lived on  
2 for millennium become second-class citizens?  
3 I want you to know that this 40,000 acres  
4 that's supposedly going to get transferred from the  
5 State to the U.S. Fish and Wildlife Service, well,  
6 that's the camping grounds of the southern Alaska  
7 Peninsula caribou herd. Now, you've all enjoyed and  
8 fought strong and hard for predator control in those  
9 areas -- right? -- because you say caribou are important  
10 to your way of life. Well, there won't be any more  
11 predator control there. Right? So you're giving that  
12 up.  
13 And as a hunter, who's hunted in Cold Bay, I  
14 have stalked geese and black brant and I have pulled up  
15 next to that Izembek Lagoon and I've taken one shot and  
16 I've sent tens of thousands of birds to flight. I  
17 hunted on that lagoon one time, and I said morally I  
18 cannot do this to these birds who are here in a critical  
19 moment in their life cycle to get fed so they can fly  
20 nonstop to Mexico. This is an asset for all Americans.  
21 This is an asset for all humans.  
22 And for you guys to think that sport hunters  
23 from around the world would not negatively impact the  
24 wildlife resources by opening up this road is crazy. I  
25 support option one.

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1 **POLLY WHEELER:** Number 21. We've got two 21s?  
2 **ERNIE WEISS:** My name is Ernie Weiss. I do  
3 work for the Aleutians East Borough. I've got comments  
4 I'll pass in on my own behalf. I'm here to read  
5 comments for the mayor of the Aleutians East Borough,  
6 Stanley Mack. He wanted to be here. He was not able  
7 to, but I believe he's listening in.  
8 So his statement is: "I was born in King  
9 Cove, have lots of family there. I go back there a lot,  
10 and this is personal. I can't even remember how many  
11 times I've stood up in front of this many people or  
12 testified in front of Congress and tried to get them to  
13 see why this road is so important, not just for King  
14 Cove, but when you go there, you'll see that it's a big  
15 deal all over the borough. And now here we are in  
16 Anchorage, many hundreds of miles from home, and we're  
17 still talking about if we should get a road and not  
18 when. But we Aleuts have learned to be patient.  
19 "There is no one to speak up for our survival  
20 except us, so please choose either alternative two or  
21 three and let us move into the circle of Americans  
22 instead of feeling we are on the outside looking in. We  
23 need to know that our government really thinks our lives  
24 count. At the moment, all that is for sure is that if  
25 we would have waited for someone to ask us what we want,

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1 we would wait forever.  
2 "We know for sure that our cabins got burned  
3 to the ground without so much as a form letter from our  
4 government. We also know for sure the government never  
5 asked us what we thought about them creating the Izembek  
6 Wilderness in our backyard and how that would impact our  
7 transportation access to the Cold Bay Airport.  
8 "We also heard local U.S. Fish and Wildlife  
9 Service staff tell us there is no way a road should be  
10 built through the Izembek Refuge. Recalling these  
11 events continue to make me sad and bewildered as to why  
12 my federal government does not respect us and our need  
13 for this simple road connection so that we can have  
14 safer and more dependable transportation access to the  
15 outside world.  
16 "It is true that we've been at this road issue  
17 for many decades and have spent long hours away from  
18 home to reach this point. So even though I'm tired of  
19 talking, I know that being able to discuss this draft  
20 EIS report is some progress and I'm glad for that. Let  
21 me say again, without any doubt, either alternative two  
22 or three is the way to go.  
23 "We know at the end of all the talking the  
24 answer still might be no. You're going to hear no from  
25 some of the people sitting here tonight. They want to

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1 speak to you, too. They want to tell you about the  
2 swans and caribou, how they must come first. They live  
3 in a world -- and maybe you do, too -- I don't know --  
4 where roads and wildlife are automatically bad news. I  
5 am looking you in the eye today and telling you that in  
6 this world we live in, and have always lived in,  
7 wildlife have nothing to fear from us. Stop and look at  
8 the record where wildlife are concerned and you have to  
9 admit it's pretty good and pretty simple: We take what  
10 we need to our families and then we leave them alone.  
11 "I have only lived in this part of the world,  
12 but I've traveled extensively to where your experts  
13 live. It's not hard to notice the difference between  
14 the two. And if you're a swan or any other animal who  
15 wants a life in this world, you're pretty happy with the  
16 Aleut way. Help us keep that way of life alive and  
17 well.  
18 "Thank you for hearing me out."  
19 **POLLY WHEELER:** Twenty-two. I think we have  
20 two twenty-twos.  
21 **ARNOLD NEWMAN:** Hello. Good evening. My name  
22 is Arnold Newman, and I'm from King Cove. People that  
23 oppose this road, I want you guys to be in our shoes.  
24 We lost people in our home trying to get a boat from  
25 King Cove to Cold Bay. We've had weather -- winds 60 to

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1 100 mile an hour. If you guys were in our shoes and  
2 seen the problem trying to dock a boat by the Cold Bay  
3 dock, it's -- sometimes it's impossible. We lose lives;  
4 we lose family members.  
5 And people that oppose this road, I would like  
6 you to be in our shoes. If you lost a family member or  
7 a person from your town, you'd be for this road and  
8 that's why we're for this. So many people have lost  
9 their lives trying to get to Cold Bay to get a flight to  
10 Anchorage. And when you guys think this road is crazy,  
11 I think you guys are crazy because our families --  
12 our -- people from our village, when you lose somebody,  
13 it's -- the whole town hurts. And I would like you guys  
14 to be in our shoes. And if you were, you would be for  
15 this road. Thank you.  
16 **POLLY WHEELER:** The other 22.  
17 **MARVIN MOSER:** My name is Marvin Moser. I've  
18 been in Anchorage for 32 years. I've been to King Cove,  
19 and I was there in a situation that I was there for  
20 three days. And I'm in support of this road.  
21 I want to say, when this road is built, if it  
22 saves one life, it's worth any birds that are lost, any  
23 birds. If it's a couple hundred, if it's a couple  
24 thousand, it's worth one life -- it's worth those birds  
25 if it saves a life.

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1 And I'm curious about the folks that are here  
2 against that road, if they live out in King Cove. I bet  
3 you don't. It's the people that are against that road  
4 that don't even live there. And I feel like the people  
5 that live there ought to have the road to protect their  
6 lives, to give them the kind of quality of life that we,  
7 that live in Anchorage, have and we expect. We have  
8 trails that the city builds so that people can walk and  
9 hike. These people need a road so they can have the  
10 same quality of life that we have in Anchorage.  
11 And, also, I wanted to just say, the lady that  
12 mentioned about the health and the birds, the wings, and  
13 stuff like that, we have a situation where we have put  
14 priority on the creature instead of the creative and  
15 people that deserve life, you know, some of the same  
16 people that don't care about other people's lives.  
17 And I think about this situation where it was  
18 in Cordova about four to six years ago, something like  
19 that, there was four pilots -- four people on a plane  
20 that lost their lives. And I wondered, if they would  
21 have had a road, they could have drove out. Thank you.  
22 **POLLY WHEELER:** Twenty-three.  
23 **AMBERLY WEISS:** My name is Amberly Weiss. I'm  
24 from King Cove. I am a member of the Agdaagux Tribe and  
25 a King Cove Corporation shareholder. I was also a

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1 hovercraft captain for Aleutians East Borough.  
2 I hear everyone talking about the 32 medevacs  
3 that were completed. More than half of those were  
4 completed in near perfect weather conditions. In other  
5 words, those patients were lucky. The other half of  
6 those medevacs -- sorry -- were completed in pretty  
7 rough weather, weather bad enough to keep my crew and I  
8 from returning home from medevacs for over a week, but  
9 we were glad to do it to save a life.  
10 One time it took us over four hours to get to  
11 Cold Bay, which is usually a 20-minute ride. The  
12 patient had severe trauma and is very lucky to be alive.  
13 It was a very dark and very cold, very windy night.  
14 But I don't hear anything about the medevacs  
15 that we were not able to complete. Sorry. I can  
16 testify to at least one during my appointment with the  
17 Aleutians East Borough. We could not complete this  
18 medevac due to extreme cold temperatures and winds in  
19 excess of 70 miles per hour. It's the worst feeling in  
20 the world to tell someone that, "Sorry, we can't help  
21 you."  
22 But the Fish and Wildlife Service and the  
23 government has a choice. I pray to God they do not have  
24 to say that, "Sorry, we can't help you." Put the lives  
25 of the people in King Cove before the inconvenience of

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1 waterfowl. Make the choice to save a life. Thank you.  
2 **POLLY WHEELER:** Twenty-four.  
3 **AARON CHRISTIANSEN:** Hi. My name is Aaron  
4 Christiansen, and I'm also from King Cove.  
5 And for the people who are against the road,  
6 Della Trumble here has been fighting for the road all  
7 her life. But you guys don't know, her daughter had  
8 crashed on a plane trying to get home. That was kind of  
9 ironic.  
10 And one of the other things I wanted to say  
11 was that we've got these guys, you know, talking about  
12 budgets and stuff and they're trying to build a road to  
13 Knik that costs -- what? -- almost three quarters of a  
14 billion dollars, a bridge, and all we want is a -- you  
15 know -- what? -- \$30 million more, if possible. And  
16 they just want to cut the time in half. We want to save  
17 people. That's all I want to say.  
18 **THE REPORTER:** Can you state your name again?  
19 **AARON CHRISTIANSEN:** Aaron Christiansen,  
20 Christian with S-E-N.  
21 **LINDSEY HAJDUK:** My name is Lindsey Hajduk.  
22 My last name is H-a-j-d-u-k. And I work for the Sierra  
23 Club here in Anchorage.  
24 The Sierra Club is a grassroot environmental  
25 organization with about 1500 members within Alaska. A

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1 core value of our membership is to protect America's  
2 public lands and waters. In this case, the objective is  
3 to protect the public land of the Izembek National  
4 Wildlife Refuge, which is also designated as wilderness.  
5 The land exchange, in order to build a road through the  
6 refuge, sets a terrible precedent for lands in our  
7 wilderness preservation systems throughout the country  
8 and it violates the purpose and mission of the refuge.  
9 Over numerous administrations, this unique  
10 wilderness and invaluable wildlife habitat has been  
11 deemed a benefit to the general public and to the  
12 international community. The Sierra Club and our  
13 members urge U.S. Fish and Wildlife Service to adopt the  
14 no-action alternative in the Izembek land exchange. An  
15 essential anchor of biodiversity and wilderness is in  
16 the refuge system. The Izembek Refuge's conservation  
17 benefits extend beyond its boundaries.  
18 Road development and use will wreak  
19 devastation on the federal wetlands, ecosystem, and  
20 wilderness area, and likely set a practice that would  
21 lead to the unraveling of conservation policies  
22 affecting other refuges and land agencies.  
23 America's great outdoors and the service's new  
24 vision for the refuge system conserving the future were  
25 built around the concept of greater public engagement

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1 related to the conversation of public lands. Conserving  
2 our public lands is but one reason to object to the road  
3 proposal through the Izembek Refuge.  
4 The Sierra Club will submit more detailed  
5 comments that will further explain why the no-action  
6 alternative should be supported in this process. Thank  
7 you.  
8 **POLLY WHEELER:** Next. Twenty-six.  
9 **KIERSTEN LIPPMANN:** Hi. My name is Kiersten  
10 Lippman. I'm a wildlife biologist with the Center for  
11 Biological Diversity here in Anchorage.  
12 We urge the Fish and Wildlife Service to  
13 support the no-action alternative. This is the only  
14 alternative that does not cause long-term damage and  
15 destruction to the internationally important wildlife  
16 habitat of Izembek National Wildlife Refuge.  
17 The proposed land exchange in alternatives two  
18 and three is totally insufficient and provides no  
19 measure of mitigation for wildlife of Izembek. This is  
20 because the qualities that make Izembek such an  
21 important habitat for migrating birds, marine mammals,  
22 and caribou are irreplaceable and are unique to Izembek.  
23 Nearly all of the world's Pacific black brant, Emperor  
24 geese, and Steller's eider rely on Izembek's eelgrass  
25 beds for food during migration and for over-wintering

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1 habitat. Without this critical food source, these  
2 already-stressed species are at risk of further  
3 population losses and future extinction.  
4 Cutting a road through Izembek is especially  
5 damaging, as this area is currently facing rapid changes  
6 due to global warming. Alaska is warming twice as fast  
7 as the rest of the world, which has a range of effects,  
8 including sea level rise, warmer waters, ocean  
9 acidification, melting sea ice, marine current and  
10 productivity changes, and increases in extreme  
11 temperature and weather events. All of these will have  
12 a negative impact on Izembek's environment and wildlife.  
13 The impacts of a road, on top of these major  
14 changes, would be disastrous. Migrating seabirds can be  
15 highly stressed by human activity. And I speak from  
16 experience. I am a wildlife biologist. I have seen it,  
17 I've observed this, and I have studied this.  
18 If these animals are unable to consume  
19 sufficient calories for their long migration because of  
20 avoidance or stress responses to road-related human  
21 activities, they may not survive the journey south.  
22 Human disturbance and changes in hydrology and the  
23 impact of the road as a barrier will also negatively  
24 impact caribou, bear, and birds.  
25 Weather conditions in the Alaska Peninsula are

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1 extreme and will be even more extreme with climate  
2 change. The Fish and Wildlife Service underestimated  
3 the cost of building and maintaining a road under these  
4 current and future challenging conditions. Maintaining  
5 the proposed road will be both costly and difficult.  
6 Traveling on this road during such conditions would be  
7 dangerous for both people and wildlife.  
8 I've worked as an EMT and I'm -- a first  
9 responder -- a wilderness responder, and I can say that  
10 you ask -- you say, exchange a human life for wildlife  
11 life. Well, there's no way to estimate how many human  
12 lives were lost. There's no way to know if those people  
13 would have survived. If you're being medevaced, you're  
14 in an extremely bad shape as it is.  
15 And so a road is not needed to meet the health  
16 and safety requirements of the people of King Cove.  
17 This is not a question of trading human life for the  
18 life of a goose because alternative A provides for safe  
19 and reliable medical evacuations. To date, more than 30  
20 successful evacuations have occurred.  
21 **POLLY WHEELER:** Twenty-seven.  
22 **REBECCA NOBLIN:** Hi. Rebecca Noblin. That's  
23 N-o-b-l-i-n. I'm also with the Center for Biological  
24 Diversity in Anchorage. And I think -- because my  
25 testimony is largely repetitive of what my colleague

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1 just said -- I'm just going to go ahead and hand it in.  
2 I just wrote that we support the no-action alternative.  
3 Thanks.  
4 **POLLY WHEELER:** Twenty-eight.  
5 **LAMAR COTTEN:** I'm Lamar Cotten, spelled  
6 C-o-t-t-e-n. I represent myself. I am in favor of  
7 alternative two or three. It's a practical approach to  
8 the complicated problem.  
9 **POLLY WHEELER:** You win the prize.  
10 Twenty-nine. 29? How about 30? We've got 30  
11 back here.  
12 **DAVID D'AMATO:** My name is David D'Amato. I'm  
13 the director of government affairs for the Alaska  
14 Primary Care Association. We represent 143 small  
15 community health centers scattered all over Alaska. Two  
16 of our health centers are represented by the  
17 Aleutians -- Eastern Aleutian Tribe -- sorry -- in Cold  
18 Bay and King Cove. And we stand with them in supporting  
19 option two or -- rather, alternative two or alternative  
20 three.  
21 This road has been long-studied. The  
22 environmental impacts have been carefully considered.  
23 We believe that the exchange is well beyond fair. And  
24 it's time to get this road built.  
25 I wish I could say something -- I'm going to

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1 get a little bit of my comments here and just say  
2 something about the precedent that's been set. We keep  
3 hearing from folks that this will set a dangerous  
4 precedent to environmental policy to cut a road through  
5 King Cove in the Izembek National Wildlife Refuge. I'd  
6 like to take vigorous exception to that. The reason  
7 being is that that law, ANILCA, the law that set out  
8 that wildlife refuge, is 32 years old. That area of the  
9 world has been populated for 5,000 years.

10 The precedent that has been set by the Aleut  
11 people and the people of King Cove and Bristol Bay is  
12 respect for the land and respect for the people. And  
13 the Alaska Primary Care Association stands with those  
14 people in looking out for their health and the access of  
15 all people within Alaska and America to get safe, easy,  
16 full access to medical care. Thank you.

17 **POLLY WHEELER:** Thirty-one.  
18 **LISA WILSON:** My name is Lisa Wilson,  
19 W-i-l-s-o-n. And I have lived in King Cove since 1974.  
20 My husband was born and raised there, as well as our  
21 three children. And we support this necessary road to  
22 Cold Bay. We also live in Cold Bay part of the year,  
23 for the past nine years, so we've lived in both -- we  
24 live there. We don't just go there to hunt and to play,  
25 we live there and fish there. And that's where our

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1 family is, and we support it fully.  
2 **POLLY WHEELER:** Thirty-two.  
3 **SEAN MACK:** Hi. My name is Sean Mack. I was  
4 born in King Cove. I went to school at the University  
5 of Washington, studied history and anthropology; got my  
6 master's degree from Idaho State University, studied  
7 anthropology and GIS.

8 One thing that I have learned in academia is  
9 that you find a lot of these studies have kind of come  
10 full circle, resorting back to just asking -- they call  
11 it traditional ecological knowledge. They find that the  
12 most reliable information comes from the people who have  
13 lived there. And I find that that's true as well, which  
14 is why at the beginning I was asking about whether the  
15 study was done using the history of the previous roads  
16 and how those impacted the birds.

17 And one of the reasons why I asked that is  
18 because if you want to know how they impacted the birds,  
19 all you've got to do is ask, you know. You can ask the  
20 people of King Cove. You can ask the people who have  
21 lived in Cold Bay and know the impact of the roads, that  
22 know these animals.

23 I heard a lot of people talk about studying  
24 these birds, what they know. And I'll tell you, I'd  
25 gladly put your five years of experience up against

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1 Henry's 50 when you want to ask about caribou, you want  
2 to ask about brant, you want to ask about what these  
3 animals are doing. That's all you have to do is ask.  
4 And that's pretty much all I have to say for that.  
5 But I do want to mention one other thing.  
6 When I was reading through the executive summary -- and  
7 I also went through portions of the full version -- one  
8 of the secondary impacts that they talked about was  
9 socioeconomics. And in the full version, you guys spoke  
10 of education as kind of a -- I guess a side effect of  
11 reliable transportation, that you thought that people  
12 could stay in school longer, there would be more people  
13 graduating. But in the executive summary, I noticed  
14 that under the effects of the socioeconomics you said  
15 they were negligible. And I would like some of that  
16 corrected, because I think education is very important  
17 and the education especially in rural Alaska is  
18 extremely important, as you pointed out in the full  
19 version. But I didn't think that was reflected in the  
20 summary because, as I said, you said it's negligible.

21 Also, in the PowerPoint presentation, you guys  
22 might want to change -- you mentioned it was 3,000  
23 years, I heard somebody else mention 5,000, and in your  
24 full version you do say that -- you know, according to  
25 the Anangula Site and some of the other archeological

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1 findings around the peninsula, it's closer to 8,000 to  
2 10,000 years of experience that the Aleuts have out in  
3 the region. So you might want to correct that slide.  
4 That's all. Thank you.

5 **POLLY WHEELER:** Thirty-three.  
6 **JULES TILESTON:** For the record, I'm Jules  
7 Tileston. I'm an independent consultant, and I'm  
8 working for King Cove Corporation -- the City of King  
9 Cove. But I think you also need to know that for the  
10 last 12 years I've lived with this particular project,  
11 first, as the project EIS third-party contractor for the  
12 Corps of Engineers that studied and authorized the  
13 hovercraft operation; secondly, for the State when  
14 funding was requested to complete the road for the  
15 hovercraft in 2007 and 2008; and now with this project.  
16 So I've got quite a history of working in EIS's,  
17 particularly in this area.

18 Rather than talk about what I would prefer or  
19 what I see, I'm going to address the process. There was  
20 a major screw-up at the end of the process where  
21 everyone had commented, all the cooperating agencies had  
22 commented on the graph that we were given to review, and  
23 then we were told by phone that the service had  
24 unilaterally decided to increase impact judgments on  
25 their own without distribution. And it was sometime

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1 later that we actually got a copy of why they were doing  
2 this. As a result of that, they said, tundra swans are  
3 going from this to a major impact. We asked what was  
4 the basis for that, and they couldn't tell us. We asked  
5 for their swan nesting data, which they provided, and  
6 unfortunately the King Cove city had to hire a  
7 contractor to take the Fish and Wildlife data, take the  
8 Fish and Wildlife ordinance for the road, and  
9 superimpose those to determine how many tundra swans  
10 were actually involved. We're not completed with the  
11 analysis. We will provide that to the service as part  
12 of our formal comments.

13 You've heard about the definitions not being  
14 applied uniformly. We'll comment on that. The biggest  
15 thing, though, is the Act also requires Kinzarof Lagoon  
16 to be added to the Izembek State Game Refuge, who by the  
17 way owns and manages Izembek Lagoon. That is not  
18 mentioned. I've heard eelgrass beds. There's 2,300  
19 acres of eelgrass beds in that one piece that could be  
20 added to the refuge, surrounded completely by  
21 wilderness. Thank you.

22 **POLLY WHEELER:** Thirty-four. Are you looking  
23 for me?

24 **ORIN SEYBERT:** Yeah. Thank you.

25 I am Orin Seybert, O-r-i-n S-e-y-b-e-r-t. I'm

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1 the founder of PenAir, Peninsula Airways. I started it  
2 just me and one airplane in 1955. I moved out to  
3 Bristol Bay when I was 13 years old, grew up there  
4 hunting, fishing, trapping, to feed my family and then  
5 started flying down -- I think I made my first trip to  
6 Cold Bay in 1956. King Cove had no runway at all, and I  
7 didn't get my Grumman until 1963 when I started flying  
8 to King Cove and Akutan.

9 I'm asked once in a while, "Why would you  
10 support this road? It's going to take business away  
11 from you, your airline." And there's a much larger  
12 picture. We built our company by helping the people and  
13 working with them. And anything that's good for our  
14 customers, we support. And believe me, this road is  
15 absolutely necessary. And in the long run, we  
16 benefit -- we'd be glad to get rid of that link  
17 between -- that we have to fly between Cold Bay to King  
18 Cove.

19 Anyway, I support strongly alternative two.  
20 The impact on the wildlife, that's ridiculous. I've  
21 been looking at various situations up and down the  
22 peninsula and the Aleutians hundreds of times and,  
23 believe me, this little road would not have any impact.

24 You talk about fish. The road doesn't go near  
25 a salmon stream. You talk about -- I heard talk and

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1 publicity about eelgrass. Well, the eelgrass is in the  
2 lagoons, Izembek, of course, and Kinzarof, by the way.  
3 And the road is not going to impact that. So there's a  
4 few tundra swan that will move around, like somebody  
5 said, and just -- they don't need to go anywhere. The  
6 road is not even going to be in their habitat. And  
7 they've got 500 miles from King Salmon to Cape Sarichef  
8 to land and breed in.

9 I lost my train of thought. Oh, the point was  
10 made that -- a good point about, if you're going to do  
11 it in King Cove, why don't you do it in all the  
12 communities, Nelson Lagoon, False Pass. Well, that  
13 would be admirable and I would love to see every  
14 community in the state have good access to a large  
15 airport, all-weather, but it comes down to economics.  
16 It's not economically feasible to support many of these  
17 communities. This is such a simple deal to support King  
18 Cove and help 900 people down there. Thank you.

19 **SHARON BOYETTE:** My name is Sharon Boyette,  
20 B-o-y-e-t-t-e. Until this past Tuesday, I was the  
21 administrator of the Aleutians East Borough and I  
22 retired on that day.

23 I just had a couple of little comments. It  
24 seems like we're at the point in the agenda where just  
25 about everything has been said. But I did want to say

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1 that I am very much going to miss visiting with the  
2 wonderful people in King Cove. I will not miss having  
3 to fly in there or back out. It truly is a terrifying  
4 flight. And even when it's not a terrifying flight,  
5 you're ready for a terrifying flight. And so this road  
6 is really needed.

7 I'll also not miss not being able to fly back  
8 to Cold Bay and having to jump from a bucking fishing  
9 vessel onto an icy ladder to get up on the Cold Bay  
10 dock. People shouldn't have to do that. It's not  
11 right. A road is the right thing to do. We need to do  
12 it soon.

13 The other comment I think I have to make,  
14 although I no longer speak for the borough, is to just  
15 mention the hovercraft briefly. The Aleutians East  
16 Borough tried very hard to make the hovercraft work for  
17 three years at an expense that other local governments  
18 would never have considered. \$3 million is a huge  
19 amount for a small rural Alaskan government. We tried  
20 very hard to make it work. It doesn't work.

21 So in King Cove and Cold Bay, it's not the  
22 answer. We're hoping that it will find a use in Akutan,  
23 as to not waste any more of the taxpayer's dollars that  
24 we've heard so much about. But we'll take it to Akutan  
25 and we'll see if we can't use it there. And hopefully

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1 it will be a success there. Thank you.  
2 **POLLY WHEELER:** Thirty-six.  
3 **LIZA MACK:** Hi. My name is Liza Mack. I was  
4 born and raised in King Cove. I have my master's degree  
5 in anthropology, and I'm currently pursuing my Ph.D. in  
6 indigenous studies at the University of Alaska Fairbanks  
7 where I am in the marine ecosystems sustainability in  
8 the arctic and subarctic program.  
9 One of the things that we talk about a lot in  
10 these classes is the way that -- the human dimension is  
11 a lot of times taken out of an ecosystem. Well, the  
12 Aleut people have been in this ecosystem for 20,000  
13 years. We've been there longer than the Defenders of  
14 Wildlife, longer than the Audubon, longer than the  
15 Sierra Club, longer than a lot of the hunters that have  
16 been flying in. We have been the stewards of this land  
17 and we have taken care of it.  
18 This road is necessary for our people. It's  
19 necessary for our health and safety. And I strongly  
20 support alternative two. I think that it is safe, I  
21 think that it is reliable, and I think that a lot of the  
22 negative terminology that has been used to define these  
23 alternatives as far as wreaking devastation, unraveling  
24 policies of wilderness areas, are false and I don't  
25 think that they properly reflect what this road would

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1 do. And I do not think that is what would happen to the  
2 wilderness, to the birds.  
3 As you can see, we have been there. We are  
4 resilient. So is our land. So is our animals. And we  
5 will respect that. Thank you.  
6 **POLLY WHEELER:** Number 37.  
7 **NICOLE WHITTINGTON-EVANS:** Thanks. My name is  
8 Nicole Whittington-Evans, and I'm here representing the  
9 Wilderness Society tonight. And we have members both in  
10 Alaska and elsewhere in the nation that care about the  
11 future of Izembek National Wildlife Refuge. Our office  
12 has been engaged in the Izembek road debate since the  
13 1990s. I appreciate the opportunity to comment tonight.  
14 I have been fortunate to spend time at Izembek  
15 National Wildlife Refuge. I have visited both  
16 communities of King Cove and Cold Bay and have talked  
17 with many people over the years about the proposed road  
18 and sat through many meetings on the topic. Thanks to  
19 Aleutians East Borough representatives and Della  
20 Trumble, I have toured King Cove, flown through its  
21 airport, spent time on the refuge, and also flown over  
22 the proposed exchange lands during my visits.  
23 This road would be incompatible with the  
24 primary purposes of the Izembek National Wildlife Refuge  
25 and it would fragment the ecological heart of the

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1 refuge. The proposed road would de-designate federally  
2 protected wilderness in order to build a road that  
3 Congress has already determined would be incompatible  
4 with the wildlife and habitat protection purposes for  
5 which Izembek was established.  
6 The internationally significant wetlands  
7 complex through which the road would be built is a  
8 critically important habitat for hundreds of thousands  
9 of migrating birds that rely on the refuge's eelgrass  
10 beds to nest, rest, and feed and is vital to a number of  
11 marine mammals, including threatened species. Nearly  
12 all of the world's Pacific black brant and Emperor geese  
13 rely on Izembek's eelgrass for their survival.  
14 The isthmus is a critical migration corridor  
15 for caribou and grizzly bears and is important tundra  
16 swan nesting habitat. The road would fragment the  
17 isthmus, an important winter habitat for caribou, which  
18 is already facing habitat challenges and declining  
19 numbers.  
20 The majority of the exchanged lands being  
21 proposed do not provide habitat comparable to the  
22 lagoon's complex. They provide quantity, but not  
23 similar quality of the 43,000 acres proposed to be  
24 included as wilderness. Half of them are uplands with  
25 no waterfowl value and the other half contain no

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1 eelgrass beds and only limited value for the waterfowl  
2 species found in the lagoon's complex. There is no  
3 comparable habitat anywhere else in the Izembek Refuge  
4 or in the proposed exchange lands that would make up for  
5 the loss of the wilderness lands found in the isthmus  
6 between Izembek and Kinzarof Lagoons.  
7 There will be impacts to subsistence. I know  
8 I'm running out of time.  
9 We do not believe that the road will offer  
10 safe or reliable transportation. You know, hazardous  
11 conditions and winter, snow blowing, will be very  
12 difficult to maintain the road if opened. I appreciate  
13 the comments here tonight regarding life-threatening  
14 situations. I think the road will not -- the road will  
15 not actually be a panacea for King Cove and will  
16 potentially cost lives. We also are doing a  
17 cost-benefit analysis and will submit detailed comments.  
18 **POLLY WHEELER:** Thank you.  
19 That's all we have signed up to give public  
20 testimony tonight, but I would encourage -- I would like  
21 to thank everybody for being here and for offering their  
22 testimony. I'd like to thank everybody for being  
23 respectful of everybody offering the testimony.  
24 I encourage people -- again, here's the public  
25 comment meetings that are going on next week. You have

1 until May 18th to submit any written comments. I really  
2 encourage you to do that. There's the e-mail address up  
3 there and fax. And there's also a -- you can do it the  
4 old-fashioned way by mailing hard copies in. So I  
5 really encourage people to do that.

6 And, again, thank you very, very much for your  
7 time and thank you for being here -- I appreciate it --  
8 on behalf of the Fish and Wildlife Service.

9 (Proceedings adjourned at 9:17 p.m.)

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1 REPORTER'S CERTIFICATE

2 I, VALERIE MARTINEZ, RPR, and Notary Public in  
3 and for the State of Alaska do hereby certify:

4 That the proceedings were taken before me at the  
5 time and place herein set forth; that the proceedings  
6 were reported stenographically by me and later  
7 transcribed under my direction by computer  
8 transcription; that the foregoing is a true record of  
9 the proceedings taken at that time; and that I am not a  
10 party to nor have I any interest in the outcome of the  
11 action herein contained.

12 IN WITNESS WHEREOF, I have hereunto subscribed  
13 my hand and affixed my seal this 17th day of May, 2012.

14  
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16  
17

18 VALERIE MARTINEZ,  
19 Registered Professional Reporter  
20 Notary Public for Alaska

21 My Commission Expires: June 22, 2014

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23  
24  
25

	<b>131 (2)</b> 14:23;49:8	<b>2.4 (1)</b> 16:8	15:8;16:8	<b>60 (1)</b> 72:25
<b>\$</b>	<b>14 (1)</b> 57:9	<b>20 (6)</b> 30:6;47:21,24;59:9, 17:64:22	<b>30 (8)</b> 5:22;23:13;32:15; 38:1;43:17;80:19;81:10, 10	<b>60,000 (2)</b> 53:8;55:7
<b>\$1 (4)</b> 14:10;18:22;19:7; 55:21	<b>143 (1)</b> 81:14	<b>20,000 (1)</b> 90:12	<b>300,000 (1)</b> 35:15	<b>7</b>
<b>\$149,000 (2)</b> 15:13;21:1	<b>15 (2)</b> 52:7;60:3	<b>200 (1)</b> 55:10	<b>32 (4)</b> 30:5;73:18;75:2;82:8	<b>70 (2)</b> 38:22;75:19
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U.S. FISH & WILDLIFE SERVICE  
IZEMBEK NATIONAL WILDLIFE REFUGE  
LAND EXCHANGE/ROAD CORRIDOR  
PUBLIC MEETING  
for the Draft Environmental Impact Statement

Taken May 7, 2012  
Commencing at 7:00 p.m.  
Volume I - Pages 1 - 71, inclusive

Taken in  
Sand Point, Alaska

Reported by: Valerie Martinez, RPR

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1                                   A-P-P-E-A-R-A-N-C-E-S  
2 For U.S. Fish and Wildlife Service:  
3                   Helen Clough  
4                   Stephanie Brady (telephonic)  
5  
6 For URS Corporation:  
7                   Joan Kluwe  
8  
9 Taken by:  
10                  Valerie Martinez, RPR  
11  
12  
13 BE IT KNOWN that the aforementioned proceedings were  
14 taken at the time and place duly noted on the title  
15 page, before Valerie Martinez, Registered Professional  
16 Reporter and Notary Public within and for the State of  
17 Alaska.  
18  
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Page 3

1                                   P-R-O-C-E-E-D-I-N-G-S  
2           **HELEN CLOUGH:** Good evening. My name is Helen  
3 Clough. And I am the head of planning for the National  
4 Wildlife Refuges in Alaska, and I work out of the office  
5 in Anchorage. And I thank you all for coming.  
6           With me is Joan Kluwe, who is from URS  
7 Corporation, and she is the project leader for actually  
8 procuring the environmental impact statement. And then  
9 we have Valerie Martinez, who is with Midnight Sun Court  
10 Reporters, and who is our court reporter and who will be  
11 taking down everything we say.  
12           And then on the phone -- I'm not sure who  
13 we --  
14           **JOAN KLUWE:** We don't know who we have.  
15           **HELEN CLOUGH:** We don't know who we have.  
16 It's listen only, but it could be other members -- who  
17 it is, is other members of our cooperating group of  
18 people. I know the one person that I am sure is on  
19 there is Stephanie Brady, who is the project manager for  
20 this. And, unfortunately, she couldn't travel this week  
21 because her husband was out of town and she didn't have  
22 anybody to watch her son.  
23           And then the other people, like perhaps from  
24 the State or, you know, other people from -- I don't  
25 know if Tom will be calling in -- Tom Lewis. So it's

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1 other people that are cooperators. You can see the  
2 different entities. So that's who it would be. We set  
3 it up so they can only listen. They don't get to talk.  
4 They can hear us. But that way, for those who couldn't  
5 get out here, they're participating in this project. We  
6 set it up that way.  
7           Anyhow, what I'll do this evening is I've got  
8 this PowerPoint program. I'll run through it briefly.  
9 I'm not going to -- there's a lot of verbiage on a lot  
10 of these slides. You've all got a copy of it. And  
11 pretty much everything that's in that program, except  
12 maybe a little bit about the cooperators, is also in --  
13 and we have more copies of the summary or we have the  
14 compact discs of the whole document, which is about 1100  
15 pages long. We actually printed out a few copies for  
16 our own use. I know Della has a two-volume set.  
17           Because what we mostly want to do this evening  
18 is just be able to give you a little bit of background  
19 and then we want to hear from you. That's our purpose  
20 in being here. And because we're a pretty small group,  
21 I'm not going to set any time limits on how long people  
22 can talk. But I guess I would ask people to be brief  
23 and remind you that you can certainly submit written  
24 comment as well.  
25           I'm going to run through -- I'll sit down so

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1 I'm not in the way as I run through this PowerPoint  
2 program quickly. But as you can see from the list here,  
3 our cooperating agencies, you know, including the  
4 tribes; the borough; the city; the state; King Cove  
5 Corporation, of course, a key partner; and then we also  
6 have the Corps of Engineers and the Federal Highway  
7 Administration. So some of the regulatory agencies, as  
8 well as the project proponents, because the purpose of  
9 this project is a land exchange.  
10           Quickly I'm going to talk about the law, the  
11 roles of the cooperating agencies, what we're proposing  
12 to do, a little bit of background on the refuge, and I'm  
13 basically going to talk about the environmental impact  
14 statement, what's in it and then where the next steps in  
15 this process are.  
16           In 2009, Congress passed this big piece of  
17 legislation. You know, it's like a couple hundred pages  
18 long. So this Subtitle E is the part that's about this  
19 project. And it directed the Secretary of the Interior  
20 to analyze the proposal for a land exchange for the  
21 purposes of constructing a road. So it's not just a  
22 land exchange, but for the purpose of constructing a  
23 road between King Cove and Cold Bay.  
24           And it's drawn up so directly that we, the  
25 Fish and Wildlife Service, would put out an

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1 environmental impact statement. And once we do that,  
 2 then it's actually the Secretary of the Interior --  
 3 currently Ken Salazar -- that would make the  
 4 determination. So he will make the final decision on  
 5 the land exchange. And he has to determine that's in  
 6 the public interest.

7       So a lot of what we're dealing with is  
 8 process, it's regulations and stuff we have to follow,  
 9 and then he has a broader set of things that he can  
 10 consider, more than just -- our environmental impact  
 11 statement will be one part of what Secretary Salazar  
 12 considers when he makes his decision.

13       The cooperating agencies are -- you know, I  
 14 showed you the list. We have written agreements that  
 15 spell out everybody's role. And in terms of the  
 16 environmental statement, it is the Fish and Wildlife  
 17 Service that's ultimately responsible for that. And  
 18 obviously we may or may not agree on -- we certainly  
 19 have not agreed on everything along the way and we may  
 20 or may not agree on everything as we continue forward,  
 21 but we've worked closely together and I can't tell you  
 22 how much I appreciate Della and Gary and the other  
 23 cooperators and all the time and effort they've put into  
 24 this project.

25       So of course the proposed action is this land

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1 exchange among King Cove Corporation, the State of  
 2 Alaska, and the Fish and Wildlife Service, specifically  
 3 Izembek Refuge, for constructing a road. And the  
 4 legislation has a lot of specific things.

5       It will be a single-lane gravel road and that  
 6 the road is primarily for public health and safety  
 7 purposes and not for commercial purposes, other than  
 8 sharing rides or shared transport. So basically  
 9 transportation of people would be allowed, but  
 10 transportation of goods, you know, by law, would not be  
 11 allowed on the road as the legislation is currently,  
 12 assuming it's approved.

13       The land exchange. We've got -- probably this  
 14 big map up here is the best one. To give you an idea of  
 15 these two -- we're looking at -- if it is approved, it  
 16 would be one of these two road corridors.

17       You can see a lot of it is the same, about  
 18 200 -- I like to round my numbers. So around 200 acres  
 19 of National Wildlife Refuge and wilderness land would be  
 20 exchanged for 40-some-thousand acres of State land up  
 21 here. And the Native corporation lands within these  
 22 green -- these are lands that are patented to King Cove  
 23 Corporation as well as King Cove -- this orange  
 24 outline -- would give up their rights -- selection  
 25 rights to about 5,000 acres within the Izembek Refuge

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1 and wilderness. They would retain those rights, but  
 2 they would have to select them from outside the refuge.

3       And then Sitkinak Island, there's about 1600  
 4 acres that would be -- this is primarily State land  
 5 already that would be exchanged from us to the State of  
 6 Alaska. And these are not at the same scale. But the  
 7 State is trading, you know, over 40,000 acres for  
 8 approximately 1600, 1800 acres.

9       And the State would be the owner of the road  
 10 corridor, as per the legislation. And you can see the  
 11 acreage figures. So in terms of acres, I mean, there's  
 12 vastly more land offered to the federal government than  
 13 we'd be giving up. And normally if you do a land  
 14 exchange, it's value for value. Well, in this case,  
 15 clearly the value -- this not an equal value land  
 16 exchange.

17       I'm going to just skip over that one  
 18 because that was kind of a -- we had -- in case we  
 19 couldn't have these paper maps where you could see them,  
 20 we had it also electronic.

21       Some other things that the law requires, that  
 22 there be a cable barrier or some other kind of barrier  
 23 along the side of the road. The purpose being to keep  
 24 vehicles and off-road vehicles from leaving the road;  
 25 that we're supposed to minimize the environmental

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1 impacts of the road corridor; that we would have a --  
 2 what they call a mitigation plan or ways to minimize  
 3 those impacts. As part of this document, that would be  
 4 enforceable if we have a land exchange; but we would  
 5 transfer the absolute minimum of federal land needed  
 6 for the road; and that we would incorporate existing  
 7 roads to the maximum extent we can.

8       And then this last thing that -- the State  
 9 lands within Kinzarof Lagoon would be designated as  
 10 State Game Refuge. And for that to happen, the State  
 11 legislature had to pass a law that would allow that to  
 12 happen. And they in fact did that already. They also  
 13 had to pass a State law to authorize a land exchange  
 14 because it isn't equal, and so the Alaska State  
 15 legislature did that back in August of 2010 -- right? --  
 16 so over -- a little close to two years ago.

17       Just a little bit about Izembek Refuge, and  
 18 obviously you guys probably know a lot more about it  
 19 than I do. It was established originally in 1960 as  
 20 Izembek Range. And then in 1980, ANILCA redesignated it  
 21 and called it the refuge. Similar management; both  
 22 managed by Fish and Wildlife Service. And ANILCA also  
 23 established the Izembek Wilderness, and so they  
 24 designated all that brighter green with -- area of the  
 25 refuge is designated as wilderness.

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1 While Izembek Refuge is the smallest refuge in  
2 Alaska, it's one of the most ecologically diverse. Of  
3 course, again -- you know, while it's important for  
4 salmon, fur bears, wolves, foxes, bears, caribou, it's  
5 really about birds and migratory birds, you know,  
6 waterfowl, seabirds.

7 And there's a number of international  
8 recognitions for Izembek. It's part of the Aleutian  
9 Islands Biosphere Reserve, which is a United Nations  
10 designation. There's a treaty that was actually signed  
11 named Ramsar in the Middle East that set up this area of  
12 Wetland of International Importance, and it's one of  
13 those. It's one of the very few sites in the United  
14 States that are. And then it's also been acknowledged  
15 globally as an important bird area. So not only is  
16 Izembek Refuge important biologically in the United  
17 States, but many of the birds that come through here,  
18 you know, go all over the world.

19 And I won't argue with you about the date, but  
20 you guys know the Aleut people have been here for --  
21 since at least 3,000 B.C. and maybe before and continue  
22 to reside in the local areas. Obviously the Russian  
23 exploration and various things the Russians did  
24 definitely changed the lives of Aleut people forever,  
25 but you have persevered and you are still here on the

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1 land.

2 Why Izembek Refuge and of course why the Cold  
3 Bay Airport exists, because of World War II, and there's  
4 many remnants of World War II facilities around the  
5 refuge. And, in fact, the roads themselves that would  
6 be incorporated, the existing roads, I think probably  
7 all are from World War II.

8 Of course King Cove -- and we have our  
9 resident expert here -- have been advocating for this  
10 road for well over 25 years. And I was recently at a  
11 meeting in King Cove where people very eloquently spoke  
12 about, you know, their desire for the road and shared  
13 stories of health and safety issues, you know, things  
14 that have happened to them personally and why they want  
15 to have a road.

16 I don't think you can see our picture, but  
17 there was a picture that the community provided of a  
18 recent medical evacuation by the Coast Guard in some of  
19 our typical weather.

20 Again, why we're doing this. The purpose and  
21 need is one chapter of the environmental impact  
22 statement, but it's really important because it sets out  
23 why the project is being looked at. So, again, the  
24 road, health and safety. The things that have really  
25 come out from King Cove, again, health and safety;

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1 reliability; having access to Cold Bay, and specifically  
2 the airport; it's a quality-of-life issue; and obviously  
3 being able to drive, you know, would be more affordable,  
4 and especially being able to drive when you know the  
5 plane is coming rather than getting stuck because the  
6 plane can't get in and out of King Cove.

7 When we -- and I know Stephanie Brady was out  
8 here and others when we did the original scoping and we  
9 started the EIS process. And some of the issues that  
10 came from both meetings in the communities and also from  
11 about 40,000 people that commented at that time, their  
12 concerns about impacts on the soil, impacts on wetlands,  
13 fish, threatened endangered species, social concerns,  
14 the cost of the borough to operate, having the reliable  
15 transportation.

16 For many interest groups, that it's  
17 wilderness, because it is designated wilderness and it's  
18 uncommon -- it's not unheard of, but it's uncommon to  
19 undesignate wilderness or to take lands out of  
20 wilderness status. And for many of the national  
21 interest groups, that's a huge issue with them.

22 The EIS has five alternatives. The no-action  
23 alternative is this EIS is an interesting situation  
24 because at the time we started preparing the document,  
25 the borough was planning to operate the hovercraft again

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1 and that's what -- you know, seasonally and that's in  
2 fact what is written in this document. And about six  
3 weeks before we thought we were going to put the  
4 document out -- we had a couple month delay -- but  
5 before we thought we were, the borough notified us that  
6 they were not planning to operate the hovercraft  
7 anymore.

8 And so when you go through, this is a draft  
9 environmental impact statement. When we prepare the  
10 final impact statement, the no-action alternative will  
11 have changed and it will reflect, you know, our best  
12 understanding, as the borough communicates to us, of  
13 their plans at that time should the road not be  
14 approved.

15 There are two road alignments, as you can see,  
16 on that map. And then there's kind of a photo map right  
17 there on the wall, a more southern alignment along  
18 Kinzarof Lagoon and a more northern alignment. And  
19 there's -- you know, there's not vast differences. One  
20 is about two miles longer and one avoids a few more  
21 wetlands, but there's not a lot of wetlands impacted by  
22 either one for the length of the road.

23 The other two alternatives that are depicted  
24 on the other maps over there come from the 2003 EIS.  
25 One would be -- our alternative four would be the

1 hovercraft operation six days a week, as was envisioned  
2 in the decision for that EIS that the Corps of Engineers  
3 did back when the hovercraft was first proposed and came  
4 into being.

5 And then the final alternative that we're  
6 considering is having a ferry running from Lenard Harbor  
7 with improvement to the Cold Bay dock so it can actually  
8 land there. And, again, that was an alternative that  
9 was evaluated in 2005.

10 So just to look at the current no-action  
11 alternatives I mentioned, it would be current modes of  
12 transportation. The borough has currently indicated in  
13 the most recent correspondence we've had with them that  
14 they were looking at -- if the road was not approved by  
15 the Secretary of the Interior, that they would be  
16 looking at trying to replace the hovercraft with some  
17 kind of a small -- you know, much smaller ferry that  
18 could use the same facility that the hovercraft was  
19 planned to use.

20 Operating the hovercraft at the level that it  
21 was operating three days a week seasonally was costing  
22 the borough about \$1 million a year in subsidies, and  
23 another \$26 million is a figure of how long over the  
24 life cycle of that hovercraft.

25 So I'm not sure what -- you know, as we get

1 borough has indicated to us that they were not planning  
2 to do that, so somebody unknown at this time would  
3 operate it. And, again, where it would come from, the  
4 new hovercraft terminal -- which I'm pointing at my  
5 computer screen -- but the new hovercraft terminal over  
6 to Cross Wind Cove and Cold Bay.

7 And then the ferry, again, six days a week.  
8 And that's estimated to cost even more to operate. And,  
9 again, running from Lenard Harbor.

10 So part of what we have to look at in  
11 environmental impact statements is what we call  
12 mitigation, which is just ways to lessen kind of the  
13 environmental impacts we see. And some of these --  
14 Joan, correct me if I'm wrong -- but a lot of these were  
15 taken from things that actually came out from the  
16 original 2003 EIS.

17 But things that we would be doing -- you know,  
18 looking at, everything from -- you know, obviously any  
19 construction project, waste control, erosion and  
20 sediment, make sure that petroleum products were handled  
21 properly; a concern that was raised, you know, about  
22 acid rock, the actual rock that would be used in  
23 construction of the road, not creating problems.  
24 Obviously the biological environment is very important  
25 to the refuge, being able to protect the fisheries and

1 with the borough and try to get some more details on  
2 what other plans the borough might have -- you know, we  
3 will definitely recognize in the final document that  
4 this new proposed ferry does not in fact exist. But  
5 we're required by law to have a no-action alternative,  
6 which isn't like just not doing anything, but it's  
7 projecting out the current situation into the future so  
8 you can compare the other alternatives.

9 Alternative two with the southern road  
10 alignment. There's a lot of numbers here, but basically  
11 200 acres going out of the refuge, you know, almost  
12 53,000 coming in. The State lands, that northern block  
13 there, those would actually all become wilderness.  
14 That's about 44,000 acres. The road would be about 19  
15 and a half miles long, of which 12 and a half miles  
16 would be new construction. And then that's, again, the  
17 map that's on the wall there.

18 Alternative three is very similar. The  
19 road -- there's a few more acres involved because the  
20 road is about two miles longer, but it's not a lot of  
21 difference. A little more expensive because it's a  
22 little bit longer. And, again, the same map there.

23 The hovercraft alternative, again, from the  
24 2003 EIS. That is estimated to require, if that were  
25 operating, at a \$2 million subsidy. And, again, the

1 wildlife.

2 Any time you open up an area to access that  
3 hasn't had -- especially vehicular access and easier  
4 access, always has concerns about -- especially in the  
5 time of -- you know, when our climate seems to be  
6 changing. I'm not sure what it's doing out here with  
7 all that winter, and such a hard winter. But, you know,  
8 invasive plant species that could come in or animals,  
9 would be some of the things that people have talked  
10 about.

11 You know, the law puts restrictions on what  
12 the road can be used for. One of the concerns and one  
13 of the effects that we've certainly seen -- and why  
14 Congress put that requirement to have some kind of  
15 barricade along the road -- is impacts can emanate off  
16 it, you know, if people left the road in off-road  
17 vehicles or other vehicles. So that was one of the  
18 mitigation measures that Congress requires. And we know  
19 there's a lot of issues with putting a barricade along  
20 the road. And it does give a good out -- if we can  
21 figure out some other way to achieve the same end.

22 Obviously, we're required to avoid and, if not  
23 avoid, mitigate the loss of wetlands. And then, you  
24 know, restoring things, especially -- disturb a larger  
25 area during construction.

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1 Some of the things about the social  
2 environment; a concern about cultural resources, you  
3 know, different ways of operating, obviously the road  
4 providing access for health and safety. One of the  
5 things the law even mentioned was limiting construction  
6 grids during subsistence harvest, if that were an issue.  
7 And potentially in the future, if opening up access  
8 provided a lot more harvests, there's a possibility of  
9 having to change hunting regulations or something down  
10 the road. So those are just some of the kinds of  
11 measures that, you know, have been discussed.  
12 One of the big things in environmental impact  
13 statements -- kind of the legal thing behind it -- is  
14 that the decision-makers can make an informed decision.  
15 It doesn't mean that we can't impact the environment.  
16 Just anything we do impacts the environment. Sometimes  
17 it's good; sometimes it's not good. But to make  
18 informed decisions. So one of the big things in  
19 there -- and the table and the summary kind of list the  
20 summary of different kinds of impacts of the various  
21 alternatives.  
22 So in alternative one, the main impact of that  
23 was the fiscal effect on the borough. It was one of the  
24 most significant impacts. And, again, we have to update  
25 that on the next one.

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1 If you look at the road alternatives, major  
2 beneficial impacts to public health and safety, it  
3 includes transportation, increased opportunities for  
4 residents to get to the airport for medical services or  
5 whatever else they want. Some of the adverse effects,  
6 potentially to public use. We think of the people that  
7 come expecting a wilderness experience, having a road in  
8 the area would not be the same; a potential for impacts  
9 to cultural resources, both historic sites and of Native  
10 occupation and some of the World War II sites; concern  
11 that there could be impacts to fish; the fragmentation  
12 of the wilderness having a piece carved out of the  
13 middle.  
14 But there's also beneficial effects of having  
15 a lot more land being designated wilderness. Concerns  
16 about adverse effects on tundra swans, brant, Emperor  
17 geese, some other birds.  
18 Caribou, I have to be honest, we don't really  
19 know. There's studies that show, when it comes to  
20 roads, some caribou will never cross a road and other  
21 caribou don't care in the least. And so that's one  
22 that, you know, we've looked at the data throughout the  
23 state -- and obviously caribou has been studied a lot in  
24 relation to other development projects in Alaska. And  
25 it would be something that, if the road goes through,

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1 we'll have to see what happens.  
2 **UNIDENTIFIED SPEAKER:** They're all over Cold  
3 Bay on the road.  
4 **HELEN CLOUGH:** Well, yeah, I mean, we've  
5 certainly seen them.  
6 Again, some of the cost numbers are just  
7 compared. I'm not going to run through all this. If  
8 you have questions, feel free to ask. Joan and I can  
9 answer them. But we really are here -- we want to hear  
10 from you, so I'm just -- operating the hovercraft more  
11 would obviously cost more, but wouldn't require new  
12 construction and new facilities.  
13 And all this EIS assumes that the existing  
14 road project and hovercraft terminal is complete, which  
15 is supposed to happen this summer. Right? And I  
16 think -- in fact, we were talking at dinner with Gary  
17 about that.  
18 And, again, what the ferry alternative would  
19 look like.  
20 So where we are right now in the comment  
21 period, this is our second public meeting. In Anchorage  
22 last week we had about 65 people attend. About half of  
23 those testified, I believe.  
24 **JOAN KLUWE:** I think there were 69 and 37  
25 testified.

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1 **HELEN CLOUGH:** And then we're here tonight.  
2 Hopefully we'll be in -- there will be a meeting in Cold  
3 Bay tomorrow. Hopefully we'll be there. Otherwise,  
4 we'll do the magic of technology. You can see other  
5 meetings we have planned for this week.  
6 You have other ways to comment. You know, you  
7 can mail us a letter, send an e-mail, you can fax. And  
8 all the addresses are there.  
9 And what comes next. The comment period ends  
10 the 18th, next Friday. And we're starting to get a lot  
11 of comments -- Joan, do you have any idea of how many  
12 comments we've gotten?  
13 **JOAN KLUWE:** The last that I looked so far in  
14 the database -- and more are coming in every day. But  
15 the last I looked, there was a little over 200 comments  
16 in the database so far.  
17 **HELEN CLOUGH:** But typically they all come in  
18 at the end. And we're starting to see some of these  
19 letter-writing campaigns and e-mail campaigns that  
20 different interest groups put together. So we  
21 anticipate -- we got about 40,000 comments when we  
22 scoped this, and so we would anticipate, I'm just  
23 guessing, about twice as many comments.  
24 So depending on how many comments we get --  
25 how long it takes Joan's firm to analyze them -- they

1 will, you know, summarize the comments. These form  
2 letters, you know, you see they all say the same thing.  
3 You just count how many of them you had. But probably  
4 sometime in mid July we should have a report together.  
5 And then the cooperators, you know, we'll  
6 begin looking at those. When people make, what they  
7 call, a substantive comment, like they say -- and I know  
8 the project proponents are questioning some of our  
9 analysis, especially data on tundra swan. And so when  
10 that comes in with a report, you know, we'll really have  
11 to look at that and, you know, respond, Oh, yeah, what  
12 you pointed out, we agree with you, and make our changes  
13 in our document or, no, we don't agree for these  
14 reasons.

15 So any time people give us those kinds of  
16 comments, we actually have to prepare a response,  
17 because we're changing something in the EIS and/or  
18 responding back to whomever made that comment, letting  
19 them know what we did with it. The opinion comment, you  
20 summarize and tabulate, but we don't have to give a  
21 response to.

22 So depending on how many and how detailed the  
23 substantive comments are, how much time they take up to  
24 work through those, we're anticipating right now that  
25 we'll spend most of the summer preparing the final

1 decision, whatever that decision is.  
2 **UNIDENTIFIED SPEAKER:** Or President --  
3 **HELEN CLOUGH:** Pardon?  
4 **UNIDENTIFIED SPEAKER:** Or President Romney's  
5 secretary.

6 **HELEN CLOUGH:** Or -- yeah. Whomever the  
7 next -- but we anticipate that the Secretary's decision  
8 will follow shortly, so that it's -- assuming Secretary  
9 Salazar stays till -- whatever happens at the election,  
10 it will probably be his decision.

11 **UNIDENTIFIED SPEAKER:** Can I go back through  
12 one more time? At the end of this process, staff will  
13 make a recommendation to your boss on the preferred  
14 alternative and then your boss will weight that with  
15 other --

16 **HELEN CLOUGH:** Well, we'll provide information  
17 to our boss --

18 **UNIDENTIFIED SPEAKER:** Right.

19 **HELEN CLOUGH:** -- at the -- at the end of the  
20 comment period, we'll say, "These are the comments we've  
21 received," and then he will make a decision, Geoff  
22 Haskett, the regional director.

23 **UNIDENTIFIED SPEAKER:** And then he'll pass it  
24 on to --

25 **HELEN CLOUGH:** He'll make a decision on both

1 environmental impact statement and that we'll issue it,  
2 I would say, in late October. I think that's probably a  
3 reasonable time frame.

4 And then after we issue the final  
5 environmental impact statement, which -- you know, this  
6 draft environmental impact statement has these five  
7 alternatives. It does not indicate a preferred one. By  
8 regulation, we're supposed to have a preferred  
9 alternative in the final environmental impact statement.

10 Then there's 30 days that we have to wait,  
11 Fish and Wildlife Service, and then our regional  
12 director can make a decision. And we anticipate -- it  
13 may take a little longer than that -- but in December  
14 he'll make a decision.

15 And then shortly thereafter -- and I do not  
16 have a time frame. This is not a process that we have  
17 ever done, the part with the Secretary. But once the  
18 Fish and Wildlife Service makes its decision on this  
19 environmental impact statement, then Secretary Salazar  
20 would take that information, along with anything else he  
21 wants to consider -- and we know he'll be getting advice  
22 from like the Bureau of Indian Affairs and obviously the  
23 King Cove folks met with his staff and I'm sure they'll  
24 be following up again -- and all the other things that  
25 he may choose to consider and then he'll make his final

1 the preferred alternative and the environmental impact  
2 statement. And then Secretary Salazar will take that  
3 environmental impact statement and anything else he  
4 wants to consider -- because he has to find the road in  
5 the public's interest.

6 So, I mean, he can consider his trust  
7 responsibility to, you know, Alaska Natives; he can  
8 consider, you know, the economics; concerns of the  
9 community. There's a lot of things he can consider  
10 beyond the environmental impact statement. So then  
11 Secretary Salazar -- whomever the Secretary of the  
12 Interior is when the decision -- that's the person who  
13 will make the final decision.

14 **UNIDENTIFIED SPEAKER:** But this final EIS --

15 **HELEN CLOUGH:** Is one part of it.

16 **UNIDENTIFIED SPEAKER:** -- will it have a  
17 recommendation to the --

18 **HELEN CLOUGH:** Yes. It will recommend that  
19 Fish and Wildlife Service --

20 **UNIDENTIFIED SPEAKER:** -- will recommend --

21 **HELEN CLOUGH:** -- you know, Mr. or  
22 Mrs. Secretary, this is what Fish and Wildlife thinks  
23 you should do. But he's under no obligation --

24 **UNIDENTIFIED SPEAKER:** I understand. He has  
25 the final say.

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1       **HELEN CLOUGH:** He has the final say. And he  
2 could do what we want or he may not do what we want.  
3 And I don't know what we want at this point, so . . .  
4       **DELLA TRUMBLE:** The last time we had this  
5 discussion, then, there was no preferred alternative at  
6 this point.  
7       **HELEN CLOUGH:** Yeah.  
8       **DELLA TRUMBLE:** Is that still a possibility at  
9 the end of this process?  
10       **JOAN KLUWE:** It's required in the final.  
11       **HELEN CLOUGH:** The only agency that -- yeah,  
12 it's required, so it would be very unlikely.  
13       **UNIDENTIFIED SPEAKER:** What you're saying is  
14 no decision?  
15       **DELLA TRUMBLE:** Exactly.  
16       **UNIDENTIFIED SPEAKER:** Pass it on to the  
17 Secretary that --  
18       **HELEN CLOUGH:** No. I mean, we have to  
19 complete the process because the law tells us we have to  
20 complete the process. So the Fish and Wildlife Service  
21 has to come up with something. And of course being that  
22 Fish and Wildlife Service is part of the Department of  
23 the Interior, I'm sure that as a decision is made there  
24 will be discussions with, you know --  
25       **DELLA TRUMBLE:** I have one more question,

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1 Stephanie, I guess -- and it never really dawned on me  
2 until sitting back and listening to this -- and that has  
3 to do with the mitigation. And if you look at the list  
4 of mitigations, technically there's nothing on that list  
5 that cannot be mitigated. As part of this process, is  
6 there a possibility that some of that potential  
7 mitigation to looking at some of the items on the list  
8 can actually be developed? Is it a possibility?  
9       **HELEN CLOUGH:** Oh, absolutely. And, I guess,  
10 just to say, the next steps, if the Secretary finds this  
11 in the public interest, then we would -- Fish and  
12 Wildlife Service, the State, and King Cove  
13 Corporation -- especially the State and Fish and  
14 Wildlife -- would work on the actual details of a land  
15 exchange agreement for that -- you know, what are the  
16 lands to be involved. And then part of that is supposed  
17 to be an enforceable mitigation plan, so what are the  
18 details in that land that would go to the State; what  
19 restrictions come with, in essence, the deed; what  
20 things would they have to commit to do in terms of the  
21 road.  
22       So, I mean, that would be some of the next --  
23 you know, assuming if it is approved and then it  
24 actually goes through the process and of course then  
25 there would be all the other things associated with

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1 actually doing the land exchange document so that the  
2 State land and the corporation land would come to us and  
3 the road corridor would go to the State.  
4       It's a long, convoluted process. If it's  
5 approved, there's still several steps to go. But, yeah,  
6 the final EIS, I think, will have more final mitigation.  
7 But if the land exchange is approved, then there would  
8 be this mitigation plan that, again, the legislation  
9 requires us to develop. And obviously that's not  
10 something that's in the document.  
11       **UNIDENTIFIED SPEAKER:** So the final  
12 recommendation will be coming from your group -- is that  
13 what you're saying -- after the analysis of --  
14       **HELEN CLOUGH:** Well, there will be one from  
15 us. There will obviously be recommendations to  
16 Secretary Salazar from --  
17       **UNIDENTIFIED SPEAKER:** Different groups.  
18       **HELEN CLOUGH:** -- other interests.  
19       **UNIDENTIFIED SPEAKER:** Okay. I see.  
20       **HELEN CLOUGH:** And certainly from the  
21 project's proponents, but I'm sure from other -- other  
22 people will try and get to him as well. Some of the  
23 environmental organizations have been very vocal in  
24 their opposition. And I think -- you know, Della and  
25 Gary and Joan were at the Anchorage meeting.

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1 Unfortunately I was in an airplane. But I know that the  
2 points of view were pretty polarized. It wasn't -- I  
3 don't know that there is much middle ground between many  
4 of the interest groups.  
5       **DELLA TRUMBLE:** And I think that's always been  
6 unfortunate and it's really saddening. I look at  
7 environmental -- and I believe in protecting the  
8 wildlife and the fishes as much as anybody else in the  
9 room and everybody here knows it's what we depend on to  
10 survive, whether it's subsistence or commercial.  
11       But for them to take something to the extreme  
12 that they do and saying what they do when they have no  
13 clue what it's like living out here -- they really  
14 don't. And, you know, look at your mitigation measures  
15 and the concern about wetlands and the loss of wetlands,  
16 but right on the other side of it, which is the social  
17 environment, there's nothing being said about the loss  
18 of lives.  
19       **JOAN KLUWE:** The health and safety line,  
20 Della, is intended to capture that. I'm sorry if it's  
21 not accurately reflected, but that's what that  
22 mitigation measure is intended to capture.  
23       **UNIDENTIFIED SPEAKER:** One other thing on the  
24 comment period. I appreciate you guys coming out to the  
25 region. I think that's great. How much weight -- you

1 know, you're going to start getting e-mails from, you  
 2 know, Audubon and wild -- you know, friends of whoever.  
 3 How much weight -- because they can push a button and  
 4 generate 10,000 no's. How much weight does that carry  
 5 versus the 80 or 200 you get from this region?  
 6 **HELEN CLOUGH:** It's definitely not a counting  
 7 game. A couple of things happen in public involvement.  
 8 Number one, the people that perceive that their interest  
 9 is being -- you know, we're doing something they don't  
 10 like, are the ones that comment. So it's not like doing  
 11 a survey where you might get, you know, a more accurate  
 12 reflection of public opinion. You always hear from the  
 13 people that don't like what you're doing a lot more than  
 14 some of the people that do like what you're doing. And  
 15 that's just typical.  
 16 And when you get those massive piles of form  
 17 letters, it's basically still just one comment. And,  
 18 yeah, we let the boss know that 40,000 people said this,  
 19 but the best idea can come from one person. And  
 20 obviously the people that make -- especially about our  
 21 environmental impact statement. The more you can --  
 22 **CONFERENCE PHONE:** Please have your pass code  
 23 and conference leader's name available. A coordinator  
 24 will assist you momentarily.  
 25 **HELEN CLOUGH:** I wonder if nobody --

1 comments and they don't know how many people gave them,  
 2 but they never let me do that. They do want to know.  
 3 But they don't put more weight just because a  
 4 whole bunch of people. It really is what the comment,  
 5 what the substance is. And, you know, in general, I  
 6 think a great deal of weight is given to the people most  
 7 directly that's affected by whatever our decision is.  
 8 But it is a National Wildlife Refuge so they have to --  
 9 you know, we have to consider -- because it belongs to  
 10 all Americans, we have to consider it. But definitely  
 11 just because we get a whole bunch of comments from these  
 12 form-letter campaigns --  
 13 **DELLA TRUMBLE:** You know, Stephanie, I've  
 14 asked this question probably almost every time we have a  
 15 hearing and to anybody we go to see in D.C., the very  
 16 same question you just asked, and I have a concern with  
 17 it. When you look at the Unimak caribou issue in the  
 18 EIS, you had 40,000 environmentally assigned cards.  
 19 There was no weight, I don't think, given to the local  
 20 people. That was totally -- you know, it was one-sided.  
 21 I don't feel -- I know my comfort level with this  
 22 process is -- you know, I have to be honest with you --  
 23 not very strong.  
 24 **HELEN CLOUGH:** I would ask you, Della, to make  
 25 sure you repeat that comment, because that's the kind of

1 **JOAN KLUWE:** This didn't happen in Anchorage.  
 2 No, I know folks are one. Stephanie has sent a couple  
 3 texts. One, she said she was having a hard time hearing  
 4 Della.  
 5 **HELEN CLOUGH:** Yeah, when we talk, I'll --  
 6 **JOAN KLUWE:** And then the other one, she said  
 7 that she looked in the database and there's been about  
 8 1500 comments.  
 9 **THE OPEPRATOR:** Hi, this is the operator.  
 10 I've just pulled your line out from conference. Did you  
 11 need assistance?  
 12 **JOAN KLUWE:** No. We're not sure what  
 13 happened.  
 14 **THE OPEPRATOR:** Oh, I heard -- our system  
 15 picked up a star zero. I'm sorry. Let me join you  
 16 right back.  
 17 **JOAN KLUWE:** Okay. Thanks so much.  
 18 **UNIDENTIFIED SPEAKER:** Star zero?  
 19 **HELEN CLOUGH:** That's what you punch in if  
 20 you're having trouble. So somebody on the other end.  
 21 It wasn't us.  
 22 Anyway, to get back to your question, you  
 23 know, it depends on the decision-maker. But, you know,  
 24 we tell them -- you know, they always want to know how  
 25 many people. I mean, I would just rather give them the

1 thing we can respond to. That is a substantive comment,  
 2 so -- and obviously we'll get that into the record.  
 3 Are there any other questions before I move  
 4 into --  
 5 **UNIDENTIFIED SPEAKER:** Yeah, I have one other.  
 6 I was listening to your presentation and your whole  
 7 presentation, the least focus was on the loss of life.  
 8 That's the thing I didn't hear in your whole  
 9 presentation. There wasn't one part of it -- I mean,  
 10 there was one comment made, but everything else that you  
 11 made was not centered around the purpose of the road.  
 12 The purpose of the road is to lessen the loss of life, I  
 13 think. That's the most important thing. That's the  
 14 focus of it.  
 15 **HELEN CLOUGH:** I appreciate that comment. And  
 16 one of the things that would be helpful for us, because  
 17 I know Joan -- we've had some trouble getting really  
 18 good information. And I realize it's very personal,  
 19 very sensitive to people. You know, we are aware of the  
 20 aircraft accidents and the loss of life in those. But  
 21 if there are other information on loss of life while  
 22 people are waiting for evacuations -- and we realize,  
 23 you know, sometimes you don't know. But that would be  
 24 very important information to help inform the  
 25 decision-maker, to provide to us -- and Joan could

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1 probably talk to Della and Gary about some of the health  
2 providers that she's tried to get information from.  
3 **DELLA TRUMBLE:** We're working on the  
4 statistics that have some of that.  
5 **HELEN CLOUGH:** Because that would be very  
6 useful for the decision-maker and as part of our  
7 analysis because that's -- other than the aircraft  
8 accident, I don't think we have really good information  
9 on that at all.  
10 **JOAN KLUWE:** When URS has called the Eastern  
11 Aleutian Tribe, we've received very limited responses.  
12 **DELLA TRUMBLE:** E-mail me what you're looking  
13 for and I'll get right on it.  
14 **UNIDENTIFIED SPEAKER:** And in addition to the  
15 loss of life, I mean, there's instances, I'm assuming,  
16 where you just have a decrease in the quality of life  
17 because somebody can't get out and get the timely  
18 medical care.  
19 **HELEN CLOUGH:** And that, I think, we  
20 definitely heard. And, again, if you think that's not  
21 characterized well in the document -- and I know many of  
22 you are not going to have the time to read in detail,  
23 but I'm sure Della and Gary and others have, but if you  
24 don't think that's adequately characterized, please let  
25 us know.

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1 So I guess I'd like -- if there's no other  
2 questions, I'd really like to move into hearing from  
3 you. And then if you please state your name for the  
4 record so that people on the phone know who's talking  
5 and also so that our court reporter can have it  
6 accurately, that would be great.  
7 I don't know that we had people sign up, so I  
8 guess I'll just say, raise your hand and I'll call on  
9 you in no particular order. You know, I'd love to hear  
10 from you.  
11 **MARTIN GUNDERSON:** I'm with the City of Sand  
12 Point, the mayor.  
13 **HELEN CLOUGH:** Would you mind sitting a little  
14 closer to the phone so that --  
15 **MARTIN GUNDERSON:** Mayor Gunderson with the  
16 City of Sand Point. I have a brief testimony concerning  
17 this project. For number one, we're fortunate to be  
18 where we're at here. Geographically, we have the  
19 aircraft and the ability to take and, you know, have  
20 people medevaced and moved out of here. So I think what  
21 I'm trying to say is that we're -- where our town is at.  
22 I've been a pilot for most of my life out  
23 here. I've flown into King Cove, reluctantly sometimes.  
24 Airport -- the alternate airport was always Cold Bay,  
25 Nelson Lagoon, Sand Point. Most of the weather that we

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1 have out here does impact the King Cove airport. It's a  
2 very tricky airport to get into, as you've heard in the  
3 past and have records of the accidents that have  
4 happened, loss of life.  
5 I've lived in this community most of my life;  
6 in the region, for a long period of time. And if I look  
7 at it from the water side, also Cold Bay is a very hard  
8 place to get into during a heavy storm. I've tried to  
9 tie up by the docks. It's impossible.  
10 So, you know, looking at just your statement  
11 earlier about all of the reasons -- I'm not going to say  
12 why it shouldn't happen. The loss of life, I think, is  
13 probably the top priority. And I think for people that  
14 live in this region, like Tiffany said, it's the quality  
15 of life.  
16 The inability to have an access road to an  
17 airport that's going to accommodate this is -- for me is  
18 unheard of. I think it's a relatively easy process.  
19 I'm looking at your statements and you have restrictions  
20 as far as what the road could be used for. I think that  
21 probably says a lot about the control that you guys have  
22 on the access of the road and on the use of the road.  
23 I think as far as costs, it's extremely  
24 expensive for the borough and for the cities that  
25 participate in the borough to address the cost of the

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1 present system that they have. And I think that in the  
2 future once the road is in place, if it happens, I think  
3 that is probably one issue that can be addressed.  
4 We're building roads here as we speak, and  
5 they do a pretty good job. I think that's a process  
6 that in rural Alaska -- any place in rural Alaska where  
7 you have a road system out there, that they can maintain  
8 them. You know, it's a one-lane highway. And I think  
9 it's probably not an easy fix, it's complicated, but I  
10 think with the right group of people, with the State,  
11 with the feds, and the corporations and the communities,  
12 I think the project should move forward.  
13 **HELEN CLOUGH:** Thank you very much.  
14 **GARY HENNIGH:** My name is Gary Hennigh,  
15 H-e-n-n-i-g-h, city administrator of King Cove for a  
16 long time, as in 23 years.  
17 This will come as no surprise to Helen, but  
18 we're on record as finding the current draft EIS very  
19 inadequate. We've learned a lot of things. We've  
20 learned to whine about that isn't going to help it, so  
21 we are spending a lot of money, the city, the borough,  
22 the tribes, the King Cove Corporation, to help the  
23 federal government to make the draft EIS into the final  
24 that it needs to be so that Secretary Salazar can have  
25 the document that he needs to make the decision that we

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1 believe needs to be made.  
2 We like Geoff Haskett. He's the regional  
3 director. We like Helen. We like everybody. But the  
4 truth is that when we heard about cooperating agencies,  
5 we were very upset because two weeks, three weeks,  
6 before the draft EIS came out, the federal government,  
7 the U.S. Fish and Wildlife Service, sort of forgot that  
8 "cooperating" means at least tell the cooperating  
9 agencies what you're doing, why a range of impact  
10 evaluations changed from minor and negligible to major.  
11 And I think we can all sort of see that we  
12 still have a lot of people that don't like what we're up  
13 to here, and we've got at least a hundred-page memo  
14 already prepared. We have hired special consultants  
15 to -- what we would say is help educate those who  
16 believe what the service believes about the impacts on  
17 tundra swans, Steller's eiders, black brant. There's  
18 just a lot of issues that we do not agree with.  
19 In the end, we don't think that technically at  
20 Geoff Haskett's level -- again, Geoff is a nice guy --  
21 that we're going to get the decision that we want. And  
22 Geoff has heard this. Helen has heard us mention this  
23 to the people back in D.C. Secretary Salazar has  
24 already heard it indirectly. We are depending upon  
25 Secretary Salazar, probably in the political world, to

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1 look out foremost for the people that he has a trust  
2 responsibility that the Congress gave the Secretary of  
3 the Interior 100 years ago and that Native people need  
4 to be heard.  
5 You all know that we believe that, how come  
6 the federal didn't listen, didn't even ask King Cove in  
7 the '70s about creating a refuge. When Jimmy Carter did  
8 ANILCA in the 1980s, nobody asked King Cove, what do you  
9 think about this. And we finally put two and two  
10 together that said, somebody -- maybe inadvertently, but  
11 it happened -- did not have enough respect for the  
12 Aleuts of King Cove to care about the impact on their  
13 life because of wilderness, finding out after the fact  
14 that we can't build a road and what that has meant to  
15 the people of King Cove for the last 20, 25 years.  
16 We've got a lot of time, a lot of energy, a  
17 lot of money in this, and we're not going to let a bad  
18 EIS process derail it. We are going to pull every card  
19 that we have. I think we know that the politics of the  
20 issue at the highest level is where this decision is  
21 going to get made. That's the point that we're playing  
22 for. In the meantime, though, we're going to try and  
23 work with the service to make the final EIS as factually  
24 correct and as accurate as we believe the situation  
25 needs to be. Thank you.

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1 **HELEN CLOUGH:** Thank you, Gary.  
2 **STANLEY MACK:** My turn.  
3 **HELEN CLOUGH:** Yes.  
4 **STANLEY MACK:** I'm Stanley Mack, mayor of the  
5 Aleutians East Borough. I had a written testimony in  
6 Anchorage. And I thank you for coming to Sand Point  
7 where I can testify in person. I will be accompanying  
8 you folks to the other sites throughout the borough.  
9 I was born and raised in King Cove, moved to  
10 Sand Point in 1962, moved back to Cold Bay for a short  
11 period of time in the '60s, and then went back in the  
12 '80s for 15 years; participated in all kinds of  
13 activities in the Izembek area, including fishing;  
14 watched the activity in the area and the effect it had  
15 on the wildlife and the fish. So I can say with  
16 experience that a road corridor through the isthmus of  
17 the Izembek Wildlife Refuge will not have an impact, an  
18 adverse impact, on the fish nor the wildlife.  
19 In your statement, PowerPoint, you identified  
20 the major impact on the black brant, the Steller's  
21 eider, and the Emperor goose were three. Those  
22 particular birds, to me, are shorebirds. I've watched  
23 the migration, particularly the migration of the black  
24 brant, as they migrate from the Yukon Delta area to the  
25 Izembek area.

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1 Every fall you can nearly set your watch by  
2 their activity. They never fly over the land. I fish  
3 up in the Port Moller area and watch the migration of  
4 these birds every fall coming down south, and they fly  
5 the coastline. Never once over land. They hit a place  
6 called Bear River, which used to be an Aleut village,  
7 and they veer to the south and come directly to Izembek  
8 Bay. Never once over land.  
9 All the years I've spent in Cold Bay hunting  
10 and fishing, I've never once seen a flock of black brant  
11 nor Emperor geese right over the isthmus as described in  
12 the PowerPoint. Steller's eiders, they molt in the  
13 Izembek Lagoon. I've never ever seen them fly over that  
14 isthmus in all my life out there. They, too, are a  
15 shorebird. They fly the coast.  
16 I've watched the birds coming in from Cold Bay  
17 to Kinzarof Lagoon just in little spurts. They don't  
18 fly on the isthmus. They fly in from the south into  
19 Kinzarof Lagoon; therefore, I take exception to the  
20 PowerPoint that was displayed.  
21 And I look at the wildlife segment of your  
22 PowerPoint where the brown bear and the caribou have  
23 been identified as this road is going have a major  
24 impact on them. At first, during the scoping meetings,  
25 the term "migratory animals" was identified.

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1 Thankfully, that term was taken out of the scoping  
2 meetings -- in the impact statement to now -- it is not  
3 there.  
4 But the measured impact on caribou with the  
5 road is quite disturbing because of the fact that my  
6 time in Cold Bay and hunting in the area, the caribou  
7 would forage along the area. They rear in Caribou Flats  
8 and then they forage. They go back and forth between  
9 their eating, and they parallel that road. I've never  
10 ever in my time in Cold Bay ever watched them go from  
11 Izembek to Kinzarof Lagoon. They were always  
12 paralleling along there. And for the most part, the  
13 larger herds have been, where I've seen them, closer to  
14 Izembek than the actual road corridor.  
15 I believe that alternative two would be the  
16 most inexpensive and the most accessible road and would  
17 have the least bit of impact on both the environment and  
18 the fish and wildlife. I believe there is one little  
19 salmon stream in Kinzarof, and that services some of the  
20 fish that go up there. But they have a very small run  
21 of chum salmon in Kinzarof Lagoon. The salmon that  
22 frequent Kinzarof Lagoon is so small that they generally  
23 look for a lake.  
24 And the creeks that I see that would be, I  
25 guess, intercepted by this road could be addressed the

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1 same way they addressed the creek in King Cove when they  
2 went -- when they first started the access project from  
3 King Cove over, they required bridges instead of  
4 coverts, and that could easily be done with this road.  
5 I worked in Cold Bay where Fish and Wildlife  
6 put a bridge over a creek in the Baldy Mountain area.  
7 That bridge was incredible. It's still there. But that  
8 was carved out of the wilderness.  
9 So everybody knows that this road could go in  
10 there with very little impact on any of the fish or the  
11 wildlife. And perhaps I'll bring a little more to the  
12 table at the next meeting. Thank you.  
13 **HELEN CLOUGH:** Thank you very much.  
14 Others that would care to speak?  
15 **CHRISTINE MACK:** Christine Mack, born and  
16 raised on Sitkinak Island, in and out of Cold Bay all  
17 the time and King Cove.  
18 One of the things that I really want to say,  
19 when I first moved to Cold Bay -- I lived 14 years there  
20 and I loved the place, as much as I love all the other  
21 communities. But the people of Cold Bay do have a  
22 tendency to welcome all the hunters. When I first moved  
23 to Cold Bay, I saw the DC-6 and those big planes coming  
24 in with hunters, I thought the Army was there to stay.  
25 I mean, I looked out the window and they were -- I never

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1 saw people dressed for hunting in green before and  
2 thought for sure it was -- but Cold Bay welcomed them.  
3 The thing that I heard when King Cove came  
4 with their four-wheelers, or whatever, they're out  
5 hunting, they were not welcome. It's like we're the bad  
6 people; we don't know how to hunt like the other people  
7 that come in. And I really, really take exception to  
8 that. And I've lived there long enough to have seen  
9 this.  
10 And also, watching the port, people coming up  
11 on these boats -- I worked there as an EMT. And there  
12 were times you just get all the way up to the dock and  
13 sometimes they just cannot get off of it. It is very  
14 crucial for those people over there and for us as well  
15 to be able to get over to see them and have access. I  
16 mean, this is how America is built.  
17 Yes, refuges are beautiful. To look at a swan  
18 is wonderful, the Emperor, but -- they're all beautiful.  
19 But we don't look at them like that. We look at them as  
20 food. And we know how to take care of them. I mean, if  
21 somebody in our group went hunting and didn't take care  
22 of their geese and didn't go and cook them and eat them,  
23 we would be after them ourselves not to take any more  
24 than you can handle. So I just ask that maybe you just  
25 take a little time to think about it from our aspect.

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1 Thank you.  
2 **DELLA TRUMBLE:** All right. Don't break my  
3 arm.  
4 Wow. Where do I start? I've done this so  
5 many times. My name is Della Trumble, and I am from  
6 King Cove. And I represent King Cove Corporation and  
7 Agdaagux Tribe.  
8 First of all, I want to say, I'm happy to be  
9 here because last year, a year ago, I didn't make it to  
10 the scoping meetings and the very same day I watched my  
11 daughter's plane crash-land in King Cove. And I know  
12 every -- just about -- the last couple years, every time  
13 I came over here, I actually did get stuck over here. I  
14 ended up, a couple times, taking a boat home.  
15 But I have to say, the thing that -- over the  
16 last month and last week and Thursday and then listening  
17 to some of the -- the presentation again today, the law  
18 basically said, this is about a land trade, about  
19 whether it's to the public interest, in exchange for a  
20 road option, one or two -- one of the two that are up  
21 there, not for a hovercraft, not for a ferry. I mean,  
22 understanding there has to be some options in there for  
23 the Corps maybe or some other thing or a NEPA process.  
24 But I really need people to -- I keep saying -- I  
25 listened last Thursday to some of the environmental

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1 groups say, well, we support a ferry, and that's not  
2 what that is about.

3       The other piece that bothers me a lot -- and I  
4 did mention it -- is basically in the mitigation  
5 measures, the loss of value of wetlands, but there's no  
6 really, I think, strong enough -- and we tried to figure  
7 out how to put this in there -- on the meaning and the  
8 loss of life and the impact that's just -- if you look  
9 at this document, it really does not emphasize that, I  
10 think, to the degree that it should, because that's why  
11 we're here.

12       And I've been hearing -- and not only in  
13 Anchorage, but when I got to King Cove I heard the same  
14 comment and actually from a couple people here. The  
15 emphasis is on the quality of life and saving life, and  
16 it really isn't there.

17       Some other comments I heard, you know, on the  
18 cost of construction of things, but it was also brought  
19 to my attention in Anchorage that one medevac at one  
20 point in time used to cost \$10,000. Well, you're  
21 looking at \$30,000 a medevac today. And when you take  
22 that times 18, 20 medevacs a year -- and understand that  
23 that dollar amount is going to increase every year --  
24 that money that -- it's taxpayers' dollars. When you  
25 start putting the Coast Guard in there and their bigger

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1 planes taking patients out of Cold Bay or C-130s, you  
2 better add up a lot more than that because that dollar  
3 is there.

4       And it bothers me when I listen to  
5 environmental groups that don't put a dollar out there  
6 to even support this, but continue to use their dollars,  
7 dollars that we raise for -- you in King Cove and Sand  
8 Point -- when they're looking at \$20,000, \$30,000 for  
9 this. And I'll make sure to make these points in Cold  
10 Bay also.

11       The other thing we talked about is the hunting  
12 measures and restrictions. And at this point, if we  
13 don't get this road, I would like to see the government  
14 stop all the hunting in Cold Bay. We can't go on those  
15 roads, why should everybody else go on those roads? We  
16 weren't there to designate these boundaries, but you  
17 have people telling us what we can and can't do there.

18       I'm sorry, but every time -- the more I do  
19 this and every single time, I think I get angrier and  
20 angrier to some degree because it's just so wrong at  
21 what we're giving up and we already gave up and what  
22 we've lost.

23       I've talked about the -- I used the Unimak  
24 caribou in the EIS as an example of that process  
25 wherein, you know, you do have the environmental

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1 community with 40,000 to 60,000 to 100,000 comments and  
2 cards and a lot of times the same letter and using that  
3 and how do you balance the opposition when the people  
4 that are for it is going to be just a fraction of that.  
5 And I hope there is a process because I have asked this  
6 question so many times, how do you weigh that and make  
7 that balance right? I don't honestly believe there is a  
8 process to do that.

9       Last, but not least, no action is not an  
10 option for us. We've been in this too long and have  
11 given up too much. And it's time to make it right.  
12 That's it.

13       **HELEN CLOUGH:** Thank you, Della.  
14       **PAUL DAY:** If I may. My name is Paul Day.  
15 I'm the city administrator here in Sand Point. And you  
16 said something, the Secretary is going to make a finding  
17 that's in the public good? What was the statement?  
18       **HELEN CLOUGH:** What the law says, he has to  
19 find the land exchange in the public interest.  
20       **PAUL DAY:** Public interest.  
21       **HELEN CLOUGH:** And that's not any kind of  
22 formal process. It's --  
23       **PAUL DAY:** I'd just like to speak on -- I  
24 absolutely agree that the number one priority is health  
25 and safety for the citizens in King Cove to be able to

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1 access the airport. I don't think there's any debate  
2 that that's the primary goal of this road.

3       But I'd like to look at this as more of a  
4 pragmatic document. And pragmatically -- and as a  
5 taxpayer, I'm looking at these numbers and I agree with  
6 Della. I don't think alternative one, no option, that  
7 isn't an option. And I don't -- you know, whether it's  
8 alternative two or three, whichever -- I don't know why  
9 there's two road alternatives. That may be just so  
10 there are two, I don't know, but I think we're actually  
11 talking about a road for the hovercraft or some other  
12 kind of landing craft. Well, I think the borough has  
13 proven that the hovercraft cannot operate in King Cove  
14 for whatever reason. I don't think the hovercraft  
15 should even be on the table.

16       But, again, back to pragmatically, if you just  
17 look at your document, alternative two in total to  
18 construct and to operate over time is \$20 million. Most  
19 of that is for the road, to build the road. After that,  
20 it's \$150,000 to -- whatever the number was. I can't  
21 find it real quick. It was \$150,000 to \$180,000 a year  
22 to maintain the road. If you go to the alternative  
23 four, the hovercraft operation -- which we've already  
24 proven doesn't work. The borough has proven that over a  
25 three-year period. And believe me, the other

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1 communities watched that money that the borough puts  
2 into that hovercraft and it did not work -- that's  
3 \$44 million. That's the number in this document.  
4 That's twice the dollar amount than the road.  
5       Then if you go to your next alternative, which  
6 was the alternative five, the Lenard Harbor ferry,  
7 \$70 million. That's your number. So you go from a  
8 25 -- 23-million-dollar number for a road to a  
9 44-million-dollar to a hovercraft that doesn't work to a  
10 70-million-dollar project to put a Lenard Harbor ferry.  
11 I think pragmatically and as a taxpayer, people need to  
12 look at that issue also.  
13       And if it's in the public's interest, who's  
14 going to pay that \$70 million? Who is going to pay to  
15 keep that hovercraft or that ferry running over time? I  
16 mean, money is no longer growing on trees, especially in  
17 this state. And I know the borough and King Cove is  
18 working diligently to find the money to build. I think  
19 they've got quite a nest egg towards the \$20 million to  
20 build the road.  
21       And then the other no-brainer, I look at a  
22 201-acre exchange for 52,583 acres. Now, granted each  
23 acre is not -- you know, it's not the same value. But  
24 anybody who thinks that the Izembek is a pristine,  
25 untraveled piece of property, they're wrong. There's

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1 old army jeep trails and four-wheeler trails on that  
2 property and have been there for years. Believe me, if  
3 somebody offered me 52,583 acres of land for a 200-acre  
4 road, I -- again, pragmatically, I don't know how you  
5 can turn that down.  
6       So, again, I'll end by saying, health and  
7 safety is the issue here, but I honestly think you've  
8 got to look at the alternatives of the \$20 million, \$40  
9 million, \$70 million numbers are -- you know, blow us  
10 away out here, the numbers that they're talking about  
11 operating these alternatives. And I'll end with that.  
12 Thank you.  
13       **HELEN CLOUGH:** Thank you.  
14       **MARTIN GUNDERSON:** I didn't know we could talk  
15 about birds. Can I add to my testimony?  
16       **HELEN CLOUGH:** You certainly may.  
17       **MARTIN GUNDERSON:** Like it was really short  
18 and fast.  
19       You know, there's three experienced pilots in  
20 here that's been flying ever since they were kids out  
21 here. That's myself, Mr. Jacobsen, and Paul Gronholdt.  
22 And I'm looking at Cold Bay. I'm looking at that map  
23 over there and I'm thinking about the bird patterns, the  
24 migratory bird patterns. We fly inland going to  
25 Anchorage and coming out to stay away from the birds

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1 traveling the waterways. We're not on the ocean side.  
2       All the areas I've traveled, from Anchorage  
3 all the way down to Cold Bay to the end of the  
4 peninsula, I could fly over lots of lakes. There's no  
5 birds. If I get near the ocean, there's a lot of birds.  
6 We fly inland to avoid migratory patterns.  
7       And I'm looking at this proposed road -- and  
8 I've made this trip many, many times from King Cove to  
9 Cold Bay. I mean, we spend hours flying all year long.  
10 Not once do I run into a flock of birds between Cold  
11 Bay, these little lakes over to Lenard Harbor, on into  
12 King Cove, all the way up to Port Moller, like Stanley  
13 said, all the way up towards Nelson Lagoon. As soon as  
14 you hit the river, the waterways, you move inland, you  
15 climb up, you stay away.  
16       That's the point I want to make, is that I'm  
17 looking at this proposed road, it's inland. The  
18 birds -- I've hunted in Cold Bay all my life. We have  
19 to go to the water. We go over to -- out to the lagoon  
20 here. But in flying, all my approaches into Cold Bay  
21 have been inland, in the fall, specifically to avoid the  
22 bird traffic. Never over Izembek. That's just a point  
23 I wanted to make.  
24       **HELEN CLOUGH:** Thank you. I appreciate it.  
25       **TIFFANY JACKSON:** My name is Tiffany Jackson.

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1 I'm with the Qagan Tayagungin Tribe. And I don't think  
2 there's anything new I can say. You know, I echo what  
3 Paul says, just logistically, dollar-wise, the  
4 hovercraft and the ferry just blow me away cost-wise.  
5       But I don't think enough emphasis is being put  
6 on health and safety. It's not just the King Cove tribe  
7 that's in King Cove. We are the tribe of Sand Point.  
8 And we have tribal members that live in King Cove, so we  
9 are just as invested in making sure that our tribal  
10 members have the ability to have safe access to health  
11 care.  
12       And, you know, with the weather in Cold Bay, I  
13 know people who have tried to take a boat to Cold Bay  
14 and have been further injured trying to get off the boat  
15 in Cold Bay. It's just not a safe option -- not the  
16 safest option.  
17       **HELEN CLOUGH:** Thank you very much.  
18       **DICK JACOBSEN:** I'm Dick Jacobsen. I've lived  
19 in Sand Point all my life. I've flown out here for  
20 about 32 years. Give me a minute to get my voice here.  
21       I've been involved with the project since day  
22 one. I guess not day one, because it was when we  
23 thought it was a project, we started it and worked on  
24 it. But, actually, people were working on it for a lot  
25 of years prior to that.

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1 And talk about health and safety, I happened  
2 to have a heart attack here in Sand Point and got  
3 medevaced to Cold Bay and got medevaced out of there to  
4 Anchorage. It was a major issue. Planes couldn't get  
5 in here to pick me up. They had to line up cars on the  
6 runway down here so a plane could load me aboard to get  
7 into Cold Bay and medevac me out of there. I probably  
8 wouldn't be here today if it wasn't available.  
9 But anyway, besides all that, I'm pretty  
10 pissed off about this whole situation. Had it been a  
11 private enterprise, you guys would have all been fired.  
12 For the amount of time this has taken, it's  
13 embarrassing. It's flat, downright embarrassing. I  
14 mean, we've been working on it for 20 years. You guys  
15 have been working on this EIS for three years. Take a  
16 look at Minneapolis. They threw up \$20 million and they  
17 got the extension on their runway -- flat bam -- money  
18 talks.  
19 You talked about having to deal with public,  
20 responsible to the public. Who the hell is the public?  
21 Excuse my language. But who is the public? The public  
22 is us. It's not somebody in Anchorage. It's not  
23 somebody in New York or Boston that's looking out for  
24 Ducks Unlimited or whatever outfit they represent,  
25 Greenpeace or whatever. It's us. We are the public of

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1 this area. Why the hell aren't you representing us? I  
2 mean, it's really, really upsetting, this whole bloody  
3 thing.  
4 You guys come out here, you've got all the  
5 textbooks, you've got everything that tells you that you  
6 know how to do things. We sat here -- for an example,  
7 just a very quick example, we sat here for three years  
8 and don't even have a subsistence hunt, the caribou,  
9 with 1200 caribou in the area, experienced Fish and  
10 Wildlife people counting them. Put one local person in  
11 the airplane from this region, the count jumped from  
12 1200 to 3600. Leave those people in the airplane for  
13 three or four years, the count remains at 3500, 3600.  
14 Take that person out of the airplane, what we got, 1200,  
15 1300 caribou again. Because the guys don't want to  
16 count or they don't see them or they don't know where  
17 the hell to look.  
18 We are the public. Take our opinion and what  
19 we know about this region into account. This road  
20 should have been put in ten years ago, never mind still  
21 looking at an EIS. And then you guys got another three  
22 years to get the thing around with. I mean, crimony  
23 sakes.  
24 If I was the employee [sic] and you guys took  
25 this long to throw a few-page paper and tell you what to

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1 do around here, you would be out the door. And I'd get  
2 somebody in here that God damn well can do it. If you  
3 guys can do it, sit down and do it. Don't sit down and  
4 ding around and make excuses for it, because that's what  
5 you're doing.  
6 The people out here need it and we've been  
7 working on it for a long time, we've put a lot of effort  
8 into it, and we deserve it. I mean, there's been a lot  
9 of people that have come and gone over the course of all  
10 of this. And I don't want to say any more. I've lost  
11 some pretty close friends.  
12 **HELEN CLOUGH:** Thank you very much.  
13 **DICK JACOBSEN:** And one more thing, you  
14 mentioned trumpeter swans a few times, how they're going  
15 to be impacted. Go outside, get in your car, drive up  
16 and take a look at the reservoir. 50 yards off the  
17 reservoir bridge, there's a trumpeter swan with his head  
18 all curled up and sleeping in there and we're driving by  
19 it about three or four vehicles every five minutes. And  
20 he's just laying there sleeping. We don't have an  
21 impact.  
22 The Native people of any region are a hell of  
23 a lot more environmentally smart than anybody from the  
24 outside that they're coming in telling us what to do in  
25 our own region. Thank you.

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1 **HELEN CLOUGH:** Thank you.  
2 **LARESA MOSES:** I'm not from here, but I live  
3 here and we made this our home. And I guess I get a  
4 little perturbed when you hear on the news, the road to  
5 nowhere, the airport to nowhere.  
6 **UNIDENTIFIED SPEAKER:** Your name.  
7 **LARESA MOSES:** Laresa Moses. And I guess I  
8 feel like -- you know, like he's talking about, the  
9 environmentalists that live in Anchorage, they have  
10 roads to everywhere. We have a ferry that comes out  
11 only, what, four months out of the year. When Carl  
12 Moses was in the legislature, he tried to get it year  
13 round. Their biggest problem was the weather. And  
14 you're talking about having this hovercraft go back and  
15 forth even during the winter three times a week. I  
16 don't believe that's going to happen because of our  
17 weather.  
18 And I think we should have a say. We live  
19 this day in and day out. I don't live in King Cove.  
20 I've been there. And it's not the greatest airport.  
21 But when you compare a life to a bird, to any animal,  
22 whether it's a beetle or whatever, there's no  
23 comparison. There is none. And animals will adapt.  
24 Believe you me -- I lived in Dutch Harbor -- they have a  
25 nest, an eagle, that's in a crane that no one is going

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1 to touch. It's wildlife and we can't touch it. We  
2 can't move it. But animals will adapt to humans. And  
3 humans, by far, are very compassionate to animals.  
4       So this road would save how many lives  
5 compared to a swan? If we lose one swan, but a human --  
6 the birds will go on, whether it's geese or a ptarmigan.  
7 Their lives are going to go on. Ours will. But if we  
8 could have saved a person.  
9       Getting into Cold -- King Cove -- I hate to  
10 say this -- I'm glad I don't live there. The weather is  
11 not always the best.  
12       **DELLA TRUMBLE:** What?  
13       **LARESA MOSES:** And, you know, getting in and  
14 out of there, it's tough. And getting into Cold Bay, by  
15 means of a road, hey, I'm all for that. And if you can  
16 get the ferry -- we don't have the roads in the  
17 Aleutians.  
18       Aleuts, when they built their villages, they  
19 built them for protection so that they can survive. And  
20 so every place that you look, they were very careful  
21 when they made their dwellings. And they didn't foresee  
22 that we were going to need the boats and the airplanes,  
23 because that wasn't important to them. But now, today's  
24 world, it's everything to us. It's a completely  
25 different world when you don't have the access to go and

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1 get the hospital [sic] that you need right in five  
2 minutes. It's very difficult.  
3       And so I say that we, as the people of the  
4 Aleutians, should matter. I mean, there's an airport  
5 going out. If the military was coming in here, they  
6 would be having an airport right now or the road would  
7 have been built. But it's us. It's a little different.  
8 Thank you.  
9       **HELEN CLOUGH:** Thank you very much.  
10       **DICK JACOBSEN:** I've got my voice back again  
11 now. Just -- I'm Dick Jacobsen, Sand Point resident.  
12       Just taking a look at your map -- and like I  
13 said, Paul and Martin, both, have flown out here just as  
14 long as I have. But if you take a look at that map and  
15 take a look at what you're getting in exchange for a  
16 minimal 200 acres, what Fish and Wildlife Service should  
17 be doing is falling over themselves to get control of  
18 that land as quickly as they can so that they can  
19 preserve what's there and figure out what the hell is  
20 there.  
21       Because if you fly up and down that beach -- I  
22 just happened to be flying up and down that beach one  
23 day, and there was a window looking at me out of a sand  
24 dune. So I turned around and I landed on the beach and  
25 I went up and looked at that window. And it was a whole

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1 little village; a major big house, a couple of small  
2 ones. There was a couple of windows in the sand dune  
3 that I seen, a door. There's some major villages up and  
4 down there.  
5       And if Fish and Wildlife Service had the  
6 audacity to have that kind of value put in their hands  
7 and they could look at our people out in this region and  
8 say that you can't have 200 acres in exchange for that,  
9 I think King Cove should pull their offer and not swap  
10 that land because it was theirs to begin with. They  
11 should keep the bloody stuff and not give it to the Fish  
12 and Wildlife Service. The Fish and Wildlife Service  
13 should really be smacked over the head for not jumping  
14 on it and having that land in their title right now.  
15 Thank you.  
16       **DELLA TRUMBLE:** Is it out of order to ask some  
17 of these guys what their opinion is of the eastern swan,  
18 the western swan, in the Izembek?  
19       **HELEN CLOUGH:** No. It's your meeting.  
20       **DELLA TRUMBLE:** This has bothered -- we kind  
21 of went through this. As going through this, we went to  
22 the various species of birds. And the last thing that  
23 came up -- and I think Stanley mentioned it -- was the  
24 tundra swan. And the biologists started talking about  
25 the eastern swan and the western swan within that

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1 isthmus. And I was like, what in the world are you  
2 talking about?  
3       A swan -- a tundra swan, their behavior, like  
4 you say what's happening here, is not any different.  
5 They'll adapt to wherever they're at.  
6       So you guys -- you guys have been out here all  
7 these years. And I just hope some more of that  
8 discussion goes on the record, because that -- the  
9 impact rate went high on that and it just didn't make  
10 sense to me. I never heard of such a thing in Cold Bay.  
11       **MARTIN GUNDERSON:** I think we've all used up  
12 about four planes out here, each of us, flying around  
13 all of our life.  
14       **DICK JACOBSEN:** We basically had several swans  
15 spend the winter right here, and it was a severe winter.  
16 It was one of the worst winters we ever had. Those  
17 swans were back and forth the whole time.  
18       **STANLEY MACK:** Stanley Mack, Aleutians East  
19 Borough. I'd just like to -- I was going to save this  
20 until we got to Cold Bay -- and I'll probably repeat it  
21 again when I get to Cold Bay -- the tundra swan, to me,  
22 is, what they used to say in the south, a carpetbagger.  
23 He just comes in and makes a home and he stays.  
24       I've noticed here in Sand Point now that  
25 they've been coming in -- and I've noticed here this

1 year particularly that there are two. There's a male  
 2 and a female setting up camp here on the island. And  
 3 they seem to be quite happy where they are. We get to  
 4 stop and watch them. And I believe we'll see them here.  
 5 I hope they don't shut the road down that's adjacent to  
 6 it.  
 7 But to take and apply so much emphasis on this  
 8 particular bird is, to me, uncalled for. Granted,  
 9 they're a beautiful bird and I would protect them with  
 10 my life. They've been prohibited from any kind of  
 11 hunting for I don't know how many years that I remember.  
 12 In fact, as a child growing up in King Cove, we've seen  
 13 them but we were told never to touch them, they're too  
 14 pretty, and we have not. We've survived off of the  
 15 other birds.  
 16 The people of King Cove and this entire  
 17 Aleutians East Borough, the Aleut people, were never  
 18 sports hunters, never will be sports hunters, and we  
 19 train our children never to be that, too. Thank you.  
 20 **PAUL GRONHOLDT:** Hi. My name is Paul  
 21 Gronholdt. I live in Sand Point. As Martin mentioned,  
 22 I've flown in and out of King Cove airport a few times,  
 23 and it's the scariest airport I've ever been to, bar  
 24 none. I wouldn't call it the airport from hell, but you  
 25 might as well call it the airport from hell. It's

1 can have the airport or you can have the clinic. And  
 2 we've got to have a deal now because the whole budget is  
 3 closed down."  
 4 And he said, "Well, I guess we can take it."  
 5 Of course Senator Stevens said, "I'll take  
 6 them all." He wanted all three. He was a pretty good  
 7 negotiator then, I believe. But anything the senator  
 8 was involved with -- well, there's -- the hovercraft  
 9 cost the borough and the taxpayers of the region a lot  
 10 of money to try to make that option work.  
 11 Some of the options weren't fully explored  
 12 under the alternative, but this is what you have to work  
 13 with. And the only one I'd pick is that second route.  
 14 That's the only one that's kind of sensible. It's a  
 15 long way, but at least you can get to King Cove.  
 16 And I'll chip in two cents on the deal. The  
 17 only land trade that's been worse is when the Natives  
 18 sold New York. This is a bad deal. But King Cove wants  
 19 it, then let them get the short end. I don't know what  
 20 the people in the future are going to look back and --  
 21 they may make fun of this land trade like they did with  
 22 the sale of Manhattan, but maybe not.  
 23 But the people of King Cove really need a  
 24 reliable way to get to Cold Bay. And even water, a  
 25 ferry -- you know, in the old days it always froze over

1 really terrifying to even think of tying your airplane  
 2 down there. Your airplane can blow away. You can tie  
 3 down as good as you can tie it, and it'll disappear. It  
 4 blows so hard up in that valley.  
 5 So I'm a strong supporter of a road option.  
 6 And this other route is as good as any other that --  
 7 two-road options. In fact, if it was my money and my  
 8 land -- of course it isn't -- I'd go right across that  
 9 little Kinzarof spit and just make a short run. Get  
 10 some Norwegian engineers and make a little short route  
 11 with a couple little bridges, but I guess that option  
 12 isn't available.  
 13 One weird thing about the -- how the road got  
 14 started and the hovercraft operation was when -- and I  
 15 applaud King Cove's efforts for all these years. But  
 16 when Senator Stevens was negotiating the budget with  
 17 Leon Panetta, who was the chief of staff to President  
 18 Clinton, the whole budget process was stopped because of  
 19 the King Cove road project.  
 20 That stopped the whole budget from the United  
 21 States being passed. And Senator Stevens called King  
 22 Cove's lobbyist and said, "I think we have a deal.  
 23 Would you guys accept it?" I think I'm kind of  
 24 paraphrasing a little bit. But he said, "You know, you  
 25 can have the road up to the hovercraft terminal or you

1 in Cold Bay. This year it did. But for about ten years  
 2 there, it didn't. You had that access. But this year,  
 3 in the winter, you couldn't get your boat to the dock.  
 4 That was a problem, just access even if you had a boat.  
 5 You couldn't get it there.  
 6 Anyway, just a few -- you've still got to come  
 7 up with some money to build the road, but I think we'll  
 8 work that through. But I want to thank you for the  
 9 opportunity. And I'd like to say hello to everybody  
 10 that's listening in radio land. I know one person is.  
 11 I won't point them out. But thank you.  
 12 **HELEN CLOUGH:** Thank you very much.  
 13 Anyone else?  
 14 **AUSTIN ROOF:** My name is Austin Roof. I'm the  
 15 general manager for the radio station here that serves  
 16 Sand Point and King Cove. And, you know, everyone  
 17 shared so much and said so many things.  
 18 My wife was raised here in Sand Point, and  
 19 I've been here for the last few years. And I had the  
 20 opportunity to go to King Cove in October of this last  
 21 year, and we were putting up a radio tower there. And  
 22 flying in was fine. We had our crew with us. We had to  
 23 take two planes in, and the flying in was nice. It was  
 24 a great village and wonderful people.  
 25 As we were flying out, though, the north wind

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1 was starting to come up a little bit over the hill. And  
2 the first plane made it out and I was on that one, and  
3 it was pretty bumpy. And I was actually pretty scared.  
4 You know, I was kind of -- you just kind of realize that  
5 one gust of wind came up out of nowhere, your plane  
6 would be in that hill. And it was kind of scary, just  
7 kind of thinking about my family and stuff, but we made  
8 it fine.  
9 And when the second plane came over, the wind  
10 had come up like twice as much. And the pilot made it.  
11 And when they had landed, there was some of my crew on  
12 there and then two kids and a mother. And they came  
13 back. The kids had been crying, screaming. The family  
14 was praying out loud to God to save them. There was --  
15 the people that were on the plane from my crew were  
16 tower riggers, so they climb like 300-foot towers for a  
17 living. He was scared to death. And he said that he  
18 thought they were going to die. These kids were  
19 traumatized from this experience, and you shouldn't have  
20 to have that.  
21 You shouldn't have to have children being  
22 terrified to leave the village. You know, it just isn't  
23 fair. I mean, the lives being lost, the inability to  
24 access hospitals, but just to have children scared to  
25 death for their life just to fly to Anchorage, you know,

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1 is just so unacceptable, in my opinion. And I came home  
2 and I told my wife, King Cove is a wonderful place, but  
3 I just don't think I can live there, you know, with that  
4 kind of access.  
5 And I also want to -- I want to thank the  
6 Wildlife Service for coming out here. I would also like  
7 to recommend personally that the U.S. Wildlife -- I  
8 would suggest that King Cove should give no land into  
9 this deal. They've paid enough, in my personal opinion,  
10 with the lost lives, with the quality of life. You  
11 know, that land is theirs and I think that they deserve  
12 to keep their land. And the land that the State of  
13 Alaska is coming up -- I mean, what's the ratio on  
14 40,000 acres versus 201? You're still making out with a  
15 great deal.  
16 So my recommendation would be King Cove does  
17 not have to pay in the land and that either alternative  
18 two or three should be without a doubt considered.  
19 Either road option, you know, should obviously be the  
20 choice. Thanks.  
21 **HELEN CLOUGH:** Thank you very much.  
22 **JADE CROMER:** I guess everybody else spoke, so  
23 I might as well, too.  
24 **HELEN CLOUGH:** We'd appreciate it.  
25 **JADE CROMER:** My name is Jade Cromer. I'm

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1 from Sand Point, and I'm city clerk here. I've spent a  
2 lot of -- I've had a lot of trips to King Cove through  
3 the winter, playing sports growing up, and there were a  
4 lot of scary flights coming in and out of there.  
5 Fortunately, I'm not afraid to fly.  
6 My family over there would rather take the  
7 ferry all the way to Anchorage to get to Anchorage  
8 because they're so afraid to fly from their experience.  
9 Fortunately, their children aren't afraid yet, but  
10 they're getting a court order for -- to be a witness for  
11 something and they can't get on the plane without a  
12 sedative or something. They've had a hard time, you  
13 know. And they need a break, because this is their  
14 life. They live there.  
15 They have a resource over there that the  
16 State -- we thrive off of the fisheries. It benefits  
17 the taxpayers. It benefits the State. You know, these  
18 people's lives -- you know, this is our people. This is  
19 our family. They need to be cared for, too.  
20 **HELEN CLOUGH:** Thank you very much.  
21 **CARL MOSES:** As you can see, I've bounced  
22 around a few years between here and Cold Bay and Dutch  
23 Harbor. It's kind of ridiculous to have to spend a lot  
24 of time fighting to save the lives of our loved ones and  
25 friends. It's, to me, a terrible situation, a sad day

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1 in King Cove when we do have an accident.  
2 And we're going to have accidents if we don't  
3 solve this problem of getting into Cold Bay. In fact,  
4 there was a time when I wished I wasn't on that plane  
5 going to King Cove. The pilot was riding along -- of  
6 course it was medical. That pilot said, let's get this  
7 so-and-so out of here.  
8 Anyway, it's a sad day when we have to sit  
9 here and fight for something that we should get  
10 automatically, as far as I'm concerned. And nobody's  
11 getting too excited. It's going to depend on one  
12 individual. And it may be politics, which normally  
13 happens, and that's not a good situation. That's why we  
14 have 12 million Mexicans in this country, because the  
15 politicians are afraid to tackle that or lose that vote.  
16 It's just too bad it's that way. That's why we wind up  
17 with poor legislation quite often. Too many  
18 politicians. I thank you.  
19 **JOAN KLUWE:** Sir, could you state your name  
20 for the record.  
21 **CARL MOSES:** Carl Moses.  
22 **HELEN CLOUGH:** I guess we've heard from  
23 everyone, so if anyone has any other comments. If not,  
24 you know, you can submit additional comments in writing  
25 if you choose. We'll have the transcript made from this

1 and make it available to the other cooperators.

2 **UNIDENTIFIED SPEAKER:** And e-mail is  
3 acceptable?

4 **HELEN CLOUGH:** Oh, absolutely.

5 **JOAN KLUWE:** We have sheets, if anyone would  
6 like them, that has the e-mail address, the fax address,  
7 the mailing address. There's sheets, you can pass them  
8 out to friends and family members. Submit it any way.

9 **HELEN CLOUGH:** If there's anyone with  
10 additional comments or additional thoughts, if you have  
11 questions or something, it's got contact information for  
12 Stephanie, the project leader, and we can try and answer  
13 those.

14 But I really appreciate everybody coming out  
15 on such a beautiful evening. And I really appreciate  
16 your heartfelt testimony on behalf of the regional  
17 director and everybody else at Fish and Wildlife  
18 Service. Thank you very much.

19 (Proceedings adjourned at 8:41 p.m.)

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1 **REPORTER'S CERTIFICATE**

2 I, VALERIE MARTINEZ, RPR, and Notary Public in  
3 and for the State of Alaska do hereby certify:

4 That the proceedings were taken before me at the  
5 time and place herein set forth; that the proceedings  
6 were reported stenographically by me and later  
7 transcribed under my direction by computer  
8 transcription; that the foregoing is a true record of  
9 the proceedings taken at that time; and that I am not a  
10 party to nor have I any interest in the outcome of the  
11 action herein contained.

12 IN WITNESS WHEREOF, I have hereunto subscribed  
13 my hand and affixed my seal this 21st day of May, 2012.

14  
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VALERIE MARTINEZ,  
Registered Professional Reporter  
Notary Public for Alaska

My Commission Expires: June 22, 2014

	21:10	7:20	36:16,22;43:2;44:15; 49:1;53:10;58:25;65:2, 4:66;24;67:4	34:24
<b>\$</b>	<b>19 (1)</b>	<b>44,000 (1)</b>		<b>adjacent (1)</b>
	15:14	15:14		62:5
<b>\$1 (1)</b>	<b>1960 (1)</b>	<b>44-million-dollar (1)</b>	<b>accessible (1)</b>	<b>adjourned (1)</b>
14:22	9:19	50:9	42:16	70:19
<b>\$10,000 (1)</b>	<b>1962 (1)</b>		<b>accident (2)</b>	<b>Administration (1)</b>
46:20	40:10	<b>5</b>	34:8;69:1	5:7
<b>\$150,000 (2)</b>	<b>1980 (1)</b>		<b>accidents (3)</b>	<b>administrator (2)</b>
49:20,21	9:20	<b>5,000 (1)</b>	33:20;36:3;69:2	37:15;48:15
<b>\$180,000 (1)</b>	<b>1980s (1)</b>	<b>50 (1)</b>	<b>accommodate (1)</b>	<b>adverse (3)</b>
49:21	39:8	7:25	36:17	19:5,16;40:18
<b>\$2 (1)</b>		56:16	<b>accompanying (1)</b>	<b>advice (1)</b>
15:25	<b>2</b>	<b>52,583 (2)</b>	40:7	23:21
<b>\$20 (4)</b>		50:22;51:3	<b>account (1)</b>	<b>advocating (1)</b>
49:18;50:19;51:8; 54:16	<b>20 (3)</b>	<b>53,000 (1)</b>	55:19	11:9
<b>\$20,000 (1)</b>	39:15;46:22;54:14	15:12	<b>accurate (2)</b>	<b>Affairs (1)</b>
47:8	<b>200 (7)</b>		30:11;39:24	23:22
<b>\$26 (1)</b>	7:18,18;15:11;21:15; 30:5;59:16;60:8	<b>6</b>	<b>accurately (2)</b>	<b>affected (1)</b>
14:23	<b>2003 (3)</b>		29:21;35:6	32:7
<b>\$30,000 (2)</b>	13:24;15:24;16:16	<b>60,000 (1)</b>	<b>achieve (1)</b>	<b>affordable (1)</b>
46:21;47:8	<b>2005 (1)</b>	48:1	17:21	12:3
<b>\$40 (1)</b>	14:9	<b>60s (1)</b>	<b>acid (1)</b>	<b>afraid (4)</b>
51:8	<b>2009 (1)</b>	40:11	16:22	68:5,8,9;69:15
<b>\$44 (1)</b>	5:16	<b>65 (1)</b>	<b>acknowledged (1)</b>	<b>again (27)</b>
50:3	<b>200-acre (1)</b>	20:22	10:14	10:3;11:20,23,25; 12:25;14:8;15:16,22,23, 25;16:3,7,9;18:24;20:6, 18;23:24;28:8;34:20; 38:20;45:17;49:16;51:4, 6;55:15;59:10;61:21
<b>\$70 (3)</b>	51:3	<b>69 (1)</b>	<b>acre (1)</b>	
50:7,14;51:9	<b>201 (1)</b>	20:24	50:23	
	67:14		<b>acreage (1)</b>	
<b>[</b>	<b>2010 (1)</b>		8:11	
	9:15	<b>7</b>	<b>acres (15)</b>	
<b>[sic] (2)</b>	<b>201-acre (1)</b>	<b>70-million-dollar (1)</b>	7:18,20,25;8:4,7,8,11; 15:11,14,19;50:22;51:3; 59:16;60:8;67:14	<b>Agdaagux (1)</b>
55:24;59:1	50:22	50:10		45:7
	<b>23 (1)</b>	<b>70s (1)</b>	<b>across (1)</b>	<b>agencies (6)</b>
	37:16	39:7	63:8	5:3,7,11;6:13;38:4,9
<b>1</b>	<b>23-million-dollar (1)</b>		<b>action (2)</b>	<b>agency (1)</b>
	50:8	<b>8</b>	6:25;48:9	26:11
<b>10,000 (1)</b>	<b>25 (3)</b>	<b>8:41 (1)</b>	<b>activities (1)</b>	<b>ago (4)</b>
30:4	11:10;39:15;50:8	70:19	40:13	9:16;39:3;45:9;55:20
<b>100 (1)</b>		<b>80 (1)</b>	<b>activity (2)</b>	<b>agree (7)</b>
39:3	<b>3</b>	30:5	40:14;41:2	6:18,20;22:12,13; 38:18;48:24;49:5
<b>100,000 (1)</b>		<b>80s (1)</b>	<b>actual (3)</b>	<b>agreed (1)</b>
48:1	<b>3,000 (1)</b>	40:12	16:22;27:14;42:14	6:19
<b>1100 (1)</b>	10:21		<b>actually (16)</b>	<b>agreement (1)</b>
4:14	<b>30 (1)</b>	<b>A</b>	3:7;4:15;6:2;10:10; 14:7;15:13;16:15;22:16; 27:8,24;28:1;45:13; 46:14;49:10;53:24;66:3	27:15
<b>12 (2)</b>	23:10	<b>ability (2)</b>		<b>agreements (1)</b>
15:15;69:14	<b>300-foot (1)</b>	35:19;53:10	<b>adapt (3)</b>	6:14
<b>1200 (3)</b>	66:16	<b>able (6)</b>	57:23;58:2;61:5	<b>aircraft (3)</b>
55:9,12,14	<b>32 (1)</b>	4:18;12:3,4;16:25; 44:15;48:25	<b>add (2)</b>	33:20;34:7;35:19
<b>1300 (1)</b>	53:20	<b>aboard (1)</b>	47:2;51:15	<b>airplane (6)</b>
55:15	<b>3500 (1)</b>	54:6	<b>addition (1)</b>	29:1;55:11,12,14; 63:1,2
<b>14 (1)</b>	55:13	<b>absolute (1)</b>	34:14	<b>airplanes (1)</b>
43:19	<b>3600 (2)</b>	9:5	<b>additional (3)</b>	58:22
<b>15 (1)</b>	55:12,13	<b>absolutely (3)</b>	69:24;70:10,10	<b>Airport (18)</b>
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U.S. FISH & WILDLIFE SERVICE  
IZEMBEK NATIONAL WILDLIFE REFUGE  
LAND EXCHANGE/ROAD CORRIDOR  
PUBLIC MEETING  
for the Draft Environmental Impact Statement

Taken May 8, 2012  
Commencing at 7:00 p.m.  
Volume I - Pages 1 - 60, inclusive

Taken at  
Cold Bay Community Center  
Cold Bay, Alaska

Reported by: Valerie Martinez, RPR

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Page 2

1                                   A-P-P-E-A-R-A-N-C-E-S  
2 For U.S. Fish and Wildlife Service:  
3                   Helen Clough  
4                   Leticia Melendez  
5                   Stephanie Brady (telephonic)  
6  
7 For URS Corporation:  
8                   Joan Kluwe  
9  
10 Taken by:  
11                   Valerie Martinez, RPR  
12  
13  
14 BE IT KNOWN that the aforementioned proceedings were  
15 taken at the time and place duly noted on the title  
16 page, before Valerie Martinez, Registered Professional  
17 Reporter and Notary Public within and for the State of  
18 Alaska.  
19  
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25

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1                   **HELEN CLOUGH:** And we do -- as we have folks  
2 on the phone, and I know -- the other name up there is  
3 Stephanie Brady, who any of you that came to our last  
4 meeting here would have met. She's actually the project  
5 leader and she couldn't be here today, but I know she is  
6 definitely listening on the phone.  
7                   What we're going to do this evening, I'm going  
8 to run through a PowerPoint presentation. We've got  
9 copies of it. There's a lot of words on this slide, and  
10 I'm going to hit the high points because what we're  
11 really here for tonight is to hear what you guys have to  
12 say, and so I'm just going to give you some really brief  
13 background.  
14                   Am I blocking the screen? Would it be better  
15 for you guys on this side of the room if I sat down? Or  
16 can you see around me? Okay.  
17                   But anyhow, and then just talk a little bit  
18 about the refuge and then some of the parts of the  
19 environmental impact statement. We have copies of the  
20 summary, the full document, which is over there on the  
21 compact disc. It's like 1100 pages long.  
22                   So just talk about some of the key parts of  
23 the process and where we go next.  
24                   By way of background, why we're doing this  
25 environmental impact statement is, in 2009, Congress

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1                   P-R-O-C-E-E-D-I-N-G-S  
2                   **LETICIA MELENDEZ:** Good evening, everybody.  
3 Welcome. We appreciate you all coming out tonight. I'd  
4 like to start the evening out with some introductions.  
5 My name is Leticia Melendez, and I am the deputy refuge  
6 manager here. Our guest today is Helen Clough from U.S.  
7 Fish and Wildlife Service and Joan Kluwe, U.S. -- URS  
8 Corporation and Valerie Martinez, Midnight Sun Court  
9 Reporters.  
10                   As you notice on this side of the screen, we  
11 have our cooperating agencies. They may be tuned in.  
12 With this phone system that we have, these cooperators  
13 might be tuned in and are able to listen but unable to  
14 comment.  
15                   So without further ado, Helen Clough will be  
16 your speaker tonight.  
17                   So, Helen, it's all yours.  
18                   **HELEN CLOUGH:** And I would like to introduce  
19 the three cooperators that we have in the room: Della  
20 Trumble from King Cove Corporation and the Agdaagux  
21 Tribe; borough mayor, Stanley Mack; and Cold -- I  
22 started to say Cold Bay. Forgive me, Gary -- King Cove  
23 city manager, Gary Hennigh.  
24                   **UNIDENTIFIED SPEAKER:** We'd love to have you,  
25 though.

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1 passed one of the omnibus bills, a great big piece of  
2 legislation. And there's one part of it about the proposed  
3 road, and it's directed to the Secretary of the Interior  
4 to do an environmental impact statement to evaluate a  
5 land exchange, trading lands, for the purposes of  
6 constructing a road between King Cove and Cold Bay.  
7                   And the basic land exchange -- I'm just going  
8 to work off this map -- of course would trade -- and  
9 these show two different alternatives. It would trade a  
10 road corridor around 205 acres -- I like to round things  
11 up -- from the State of -- and some land over -- about  
12 1600 acres on Sitkinak Island would go to the State of  
13 Alaska in exchange for about 43,000 acres up here  
14 adjacent to and within the Alaska Peninsula Refuge and  
15 then about 13,000 acres of land owned by the King Cove  
16 Corporation here, here, and here.  
17                   The King Cove Corporation would also  
18 relinquish this area -- I don't know if you can see.  
19 It's highlighted in kind of orange here -- within the  
20 Izembek Wilderness, a selection of over 5,000 acres.  
21 They would still have those selection rights, but they  
22 would pick new lands from outside the refuge and  
23 wilderness.  
24                   So that's the basic land trade. There's kind  
25 of this two-step process. Fish and Wildlife Service is

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1 doing this environmental impact statement. And then at  
2 the end of -- after we complete our process, the  
3 Secretary of the Interior will determine if the land  
4 exchange is, quote, in the public interest. And he can  
5 consider things beyond the environmental impact  
6 statement, such as his trust responsibility to Native  
7 American/Alaska Native tribes and other factors that he  
8 may choose to consider.

9 That's not any kind of -- you know, doing an  
10 environment impact statement has a lot of the, you know,  
11 formal bells and whistles and regulations that tell us  
12 how to do it. For the Secretary to make a public  
13 interest finding is not something that is defined in  
14 law, other than exactly what it says in the law. So  
15 that will be -- you know, the final decision will be up  
16 to the Secretary of the Interior, who currently is Ken  
17 Salazar.

18 On this project, as you saw, we have a list of  
19 cooperating agencies that worked with us on the project.  
20 But in the end, in terms of the environmental impact  
21 statement, the Fish and Wildlife Service is the lead  
22 agency and is responsible for the EIS and its decision.

23 Of course the proposed action is a single-lane  
24 gravel road between the two communities, primarily,  
25 according to the law, for health and safety. And a key

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1 thing to understand -- this is from the law -- is that  
2 it would be used for noncommercial purposes, except for  
3 shared rides or taxis. So, in essence, people can be  
4 moved on the road, but like fish, you know, commercially  
5 caught fish, or other goods, you know, freight and  
6 stuff, is not allowed on the road by law.

7 The land exchange, I just showed you on the  
8 map there. In the law, it has some acreages listed.  
9 And, of course, as you start drawing on maps and drawing  
10 lines, they get a little bit defined. But you can see  
11 here, you know, basically the 206 acres for a road  
12 corridor, more or less; 1600 acres on Sitkinak Island  
13 that would go to the State; basically six-by-twelve  
14 miles, a little corner, would come to the refuge from  
15 the State; and then a large -- you know, over 13,000  
16 acres of King Cove Corporation land.

17 Obviously it is not an equal value of land  
18 exchange. Normally if we trade land -- you know, people  
19 trade land to governmental -- or, you know, to the State  
20 of whomever, it's value for value. That may not be the  
21 same acres because, you know, someone might have a much  
22 higher value. But in this case, everybody acknowledges  
23 that it is not an equal value land exchange. The  
24 government would be getting a lot more than they would  
25 be giving up in terms of acres.

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1 Things that we're looking at in the land  
2 exchange. I've talked about the maps. Some of the  
3 other requirements from the law are that a cable barrier  
4 or some other kind of barrier would be located alongside  
5 of the road. The purpose of that would be to keep  
6 vehicles on the road and not having vehicles or ATVs  
7 leave the road; that we're supposed to minimize the  
8 impact to the road corridor on the refuge; that we're  
9 supposed to have an enforceable mitigation plan. And  
10 that's measures to lessen impacts to refuge resources,  
11 such as loss of wetlands, wildlife impacts.

12 Again, to transfer the minimum amount of acreage  
13 that's required for building the road, and to  
14 incorporate the existing road system to the extent that  
15 we can. It also required that the State of Alaska  
16 designate State lands within Kinzarof Lagoon as a State  
17 Game Refuge. And in 2010, the State of Alaska  
18 legislature passed a law -- because the State also --  
19 because it wasn't an equal value exchange under State  
20 law, the legislature had to pass a law authorizing the  
21 land exchange and authorizing that the land exchange  
22 that goes through Kinzarof will become part of the State  
23 Game Refuge. And so the governor signed that back in  
24 August of 2010.

25 Just really briefly, the refuge was originally

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1 established in 1960. It's the Izembek National Wildlife  
2 Range. And then it became a refuge, basically a  
3 redesignation, in 1980. The other thing Congress did in  
4 1980 -- and the really bright green on this map -- was  
5 created the Izembek Wilderness, which is most of the  
6 refuge. And so that was something that, again, was done  
7 in 1980. The original refuge was not wilderness.

8 Of course Izembek Wildlife Refuge, that's what  
9 we're about. You know, we're kind of a single-focus  
10 agency. You know, obviously bears are important,  
11 caribou, wolves, foxes, a diverse array of wildlife, but  
12 it's really about the migratory birds here.

13 And Izembek Refuge is kind of unique from the  
14 Alaska refuges in that we have several international  
15 recognitions, from being a Biosphere Reserve, which is a  
16 United Nations program, what's called a Wetland of  
17 International Importance. That's a treaty signed many  
18 years ago. There are very few sites in the U.S. And  
19 it's also a Globally Important Bird Area. So these are  
20 all special designations beyond the refuge -- the refuge  
21 itself reflects its importance.

22 Of course, I'm sure everybody lives here,  
23 there's no stranger to the long -- whether it's 3,000  
24 B.C. or older, the long-time occupancy of the area by  
25 the Aleut people, the impacts that the Russian explorers

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1 and others had that changed their way of life, but  
2 people have persisted here through time. And, of  
3 course, especially in the Cold Bay area and the reason  
4 that Cold Bay here, obviously, was the infrastructure  
5 coordinated during World War II. And, you know, as time  
6 passes, people my age, that wasn't that long ago, but I  
7 guess it was. You know, these are now considered  
8 historic resources as well.  
9 Obviously King Cove and others have been  
10 advocating for a road connection between the two  
11 communities for over 25 years, and people believe that  
12 it is something they need for their health and safety.  
13 A picture here of a recent medevac on a similar day like  
14 today.  
15 Again, the land exchange, transferring the road  
16 corridor and the health and safety. In our document, we  
17 describe the purpose and need. That's one of the  
18 requirements under the regulations that tell you how to  
19 write an environmental impact statement. And the things  
20 the community is looking at: Health and safety; a  
21 reliable transportation system for access to medical  
22 care -- it's not just emergencies, but in general;  
23 quality of life, being able to get to the airport when  
24 you want to; and an affordable transportation system.  
25 The borough is very concerned about the amount of money

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1 the hovercraft is costing. Obviously flying or using  
2 the hovercraft costs residents more than it would taking  
3 a drive.  
4 Some of the issues that we heard when we scoped  
5 and we came out here for meetings before, a concern  
6 about impacts on geology, soils -- I don't think we  
7 really have an impact to geology -- hazardous materials,  
8 either going through old military stuff or oil spills  
9 and stuff related to road construction. Obviously, the  
10 biological environment, very much concern to the refuge  
11 in terms of fisheries, threatened and endangered  
12 species, wetlands, and other wildlife.  
13 The social environment, concerns from the  
14 community and others, especially the medical community  
15 as well, about human health and public safety for the  
16 residents of King Cove; effects on land ownership and  
17 use; the economics of various alternatives we're  
18 considering; the desire to have a reliable and  
19 affordable transportation system.  
20 And then a big concern for many people outside  
21 the local area and many national interest groups would  
22 be the effects on wilderness. While it is not  
23 unprecedented, it's not common to do a land exchange  
24 that would take land -- because when the land goes -- if  
25 the land goes to the State, it would no longer be

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1 wilderness. It would be State land. And so taking land  
2 out of a wilderness and, in essence, cutting it into a  
3 couple of pieces is not a common thing, and that is a  
4 great concern to some folks.  
5 We have five alternatives in the environmental  
6 impact statement. And the maps in the back, as well as  
7 the current displayed, talk about them.  
8 Our no-action alternative means continuing, you  
9 know, with the current management or current situation,  
10 which in this case when we started writing the  
11 environmental impact statement was the borough planned  
12 to start operating the hovercraft again three days a  
13 week between the communities seasonally. And that's  
14 what is actually written up in the document.  
15 But not too long before we thought we were going  
16 to release the document last fall, the borough notified  
17 us that they had decided they could not afford to  
18 continue to operate the hovercraft, they were not going  
19 to operate the hovercraft, and more recently has  
20 indicated to us and the Corps of Engineers that were the  
21 land exchange not approved, they're looking at acquiring  
22 some kind of a smaller landing craft-style ferry. But  
23 that doesn't exist. It's a preliminary plan.  
24 So as we take this document from the draft  
25 environmental impact statement to a final, we will be

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1 looking at, you know, what are the current plans of the  
2 borough. At some point we'll have to cut that off in  
3 terms of a no-action alternative. So that's something  
4 we know is going to change.  
5 The other -- there are two road alternatives, a  
6 southern corridor, you can see on that map and the maps  
7 in the back. And I'll go through -- I'll have some maps  
8 in a minute.  
9 Alternative four was -- would be a hovercraft  
10 operating six days a week. And that was the preferred  
11 alternative in the EIS in the decision made by the Corps  
12 of Engineers back in 2003 when the hovercraft came into  
13 being through that process. And of course the Corps of  
14 Engineers is one of our cooperators.  
15 And then alternative five came also from that  
16 original 2003 EIS, and that was the idea of a larger  
17 icebreaking ferry, including having improvements to the  
18 dock there in Cold Bay so the ferry could land and  
19 people could be offloaded in a safe fashion.  
20 So just to talk -- yeah, explain kind of  
21 alternative one, it's a morphing alternative.  
22 Alternative two would be the southern road, and  
23 that is definitely favored by some of the cooperators.  
24 It's a little bit shorter. It's about two miles shorter  
25 than the other. It's also the least expensive in terms

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1 of the estimated -- you know, less road, less cost to  
2 build. It does have a little bit more wetlands that  
3 would be impacted.  
4 And this figure, if you can see, the blue line  
5 is the southern route, alternative two. And the pink  
6 line is the northern route, or you may see it more  
7 clearly in the red there. A lot of it -- it both ends  
8 on the same route, so it just varies where it kind of  
9 goes across the center of the refuge.  
10 Alternative three is about two miles longer. It  
11 actually impacts a little less wetlands, because it  
12 wiggles around the wetlands a little more than the other  
13 alternative. It costs a little bit more because it's  
14 longer in terms of the construction and the annual  
15 maintenance cost.  
16 Alternative four would be the hovercraft  
17 operating six days a week. The borough had estimated  
18 that it would cost \$2 million a year to operate that.  
19 The borough has also maintained -- you know, disbanded  
20 their plans to do this. And that would operate from the  
21 new hovercraft terminal that is under construction to  
22 Cross Wind Cove.  
23 The last alternative is the ferry alternative,  
24 the most expensive estimated cost, \$2.3 million to  
25 operate. And that would operate out of Lenard Harbor.

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1 The mitigation measures. And those are things  
2 that Fish -- I mean, the EIS has to include those. But  
3 if it was decided to proceed with the project, if the  
4 Secretary finds the land exchange in the public  
5 interest, those would vary from things that would be  
6 required during construction, like erosion and sediment  
7 control, to things that could be required -- you know,  
8 Congress put in this idea of some kind of a barrier  
9 along the road to keep vehicles on it, some way of  
10 enforcing the rules that it's a road -- to transit on  
11 the road and not access for vehicles to access it. It's  
12 a refuge, so obviously people would be allowed to leave  
13 the road on foot.  
14 Other things that could be looked at are -- you  
15 know, there's cultural resources in the area, so what  
16 kinds of mitigation we do to protect those, things that  
17 we might view in terms of any kind of restrictions on  
18 road use or construction seasonally -- during the  
19 construction season to protect wildlife.  
20 And if this was approved, those would eventually  
21 be in enforceable mitigation plans. So some of that  
22 could actually be in the deed document that went to the  
23 State if the land exchange is approved, and others might  
24 be some kind of a formal agreement between us and the  
25 State and/or whomever ends up operating the road.

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1 The summary that many of you have, the blue  
2 summary, has a big table at the end, and that summarizes  
3 the types of environmental impacts. And generally the  
4 biggest impacts from the no-action alternative are in  
5 the health and safety arena, in that there's only  
6 limited means of transit. And also if it was the  
7 hovercraft, then obviously the financial impact to the  
8 borough.  
9 The land exchange options and road options are  
10 seen as having major beneficial effects for public  
11 safety and transportation and increased opportunities  
12 for residents to go back and forth. Both those  
13 alternatives have some pretty projected adverse impacts  
14 on cultural resources, wilderness visitors, fragmenting  
15 the wilderness, and especially some of the bird species.  
16 Caribou specifically, the adverse effects or not  
17 adverse effects aren't really known. Caribou react  
18 differently to roads. There's a lot of data around the  
19 State. Some caribou, you know, they had them followed  
20 through the years, and they only followed along the  
21 road, others go back and forth. And obviously around  
22 here -- I've seen them myself right by the road. So how  
23 that might affect them would be something we'd have to  
24 discover through monitoring if the road is built.  
25 The hovercraft operations, the impacts would

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1 be -- it would be -- you know, more access by  
2 hovercraft, but additional costs, if it was operated six  
3 days a week. And if a ferry was operating, even more  
4 costs. You know, it could provide good access if it  
5 worked and was available. And there might be other  
6 beneficial effects, harbor improvements in Cold Bay.  
7 So where are we in this process? This is our  
8 third public meeting. We hope we have three more coming  
9 up this week, weather permitting. The comment period  
10 ends next Friday, May 18th. And you can obviously speak  
11 tonight, and we have the court reporter here taking down  
12 everything that's said at this meeting. You can submit  
13 written comments. Our e-mail address is on there. The  
14 handouts you have, have that. You can also, you know,  
15 submit them in writing to Stephanie.  
16 And once we get the comments in -- and as of  
17 last night, I think, we had about 1500. And it's very  
18 typical of most public comments, we get them all in  
19 towards the end. We're starting to get some of those  
20 e-mail campaigns where different groups go out to their  
21 membership. You know, we get a lot of e-mails that say  
22 the same thing.  
23 But Joan Kluwe, who is our lead from URS, the  
24 contactor preparing the EIS, her company, they will be  
25 analyzing the comments. And those comments, what we

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1 call substantive -- and we know the King Cove group has  
2 taken issue with some of the analysis we have with  
3 wildlife impacts, and so we know that they're going to  
4 provide very substantive comments.  
5 And we will look at those and be discussing  
6 those, and we will respond back to them in the final EIS  
7 with, I'm sure, some changes to the document. And,  
8 also, if there's things we don't agree with, an  
9 explanation of why or, oh, yes, we agree with this and  
10 we made these changes. And other substantive  
11 comments -- I'm just using those as an example -- we  
12 actually respond back to those in the document.  
13 The comments that are opinions, I don't like  
14 this or I do like this, you know, we tabulate those and  
15 acknowledge them, but we don't have to say, you know,  
16 thank you for your comment and try and engage in  
17 dialogue in that way.  
18 This summer we will be preparing the final EIS.  
19 I estimate that it will be out about the end of July.  
20 And then we have to wait 30 days after we issue the  
21 final environmental impact statement. And by  
22 regulation, it has to have a preferred alternative. The  
23 draft doesn't have a preference. But when it comes to  
24 the final, the Fish and Wildlife Service, as the lead  
25 agency with input -- I know the regional director has

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1 indicated he will be meeting personally with all the  
2 cooperators, but at some point he will make a decision  
3 on what his preferred alternative is.  
4 That will be available for at least 30 days.  
5 And then around the end of the year, he will make a  
6 decision on the environmental impact statement, which  
7 will be, in essence, the Fish and Wildlife Service's  
8 recommendation to the Secretary of the Interior.  
9 And then sometime after that -- and it could be  
10 a matter of days. I really don't know. The process is  
11 not something we have ever done before. But I'm  
12 assuming fairly soon thereafter the Secretary,  
13 Mr. Salazar, or whomever it is at that point in time,  
14 would make his or her finding that the road -- you know,  
15 and he didn't have to -- you know, the Fish and Wildlife  
16 Service will make a recommendation, but obviously if we  
17 were to recommend one thing and somebody else recommends  
18 something else to him, he doesn't have to go along with  
19 what we recommend.  
20 So he will make -- you know, he will be the  
21 final decision-maker because Congress, you know, in  
22 essence, delegated their decision-making power. Only  
23 Congress can make or take away wilderness, and they, in  
24 essence, for this project delegated that to him. So he  
25 will make the final decision.

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1 So what we can do now, is if people have any  
2 questions, I can take a couple of questions. And Joan  
3 and I can probably answer them about the document or the  
4 comment period or anything, and then I'd like to move --  
5 but what I really want to do is hear from you.  
6 And because we have folks on the phone, I'd like  
7 to ask you to -- when you speak, if you would come up  
8 and talk into the phone. And there's not that many  
9 people here so I'm not going to just limit you and say  
10 you only have three or five minute, but I would ask you  
11 to keep your comments brief.  
12 But if there are any just general questions that  
13 you want to ask to have more understanding before we  
14 start listening to you, ask away.  
15 **JOHN MAXWELL:** On the original -- she said to  
16 ask her.  
17 On the original try on building the road a few  
18 years ago, and they started on both ends, they couldn't  
19 meet in the middle, what are they doing on that to make  
20 those -- I mean, it wasn't viable four years ago when  
21 they tried to do it. What have they done differently on  
22 this one to make that course now viable?  
23 **HELEN CLOUGH:** So for the folks on the phone,  
24 I'll try and summarize the question in case you couldn't  
25 hear. The question was basically what's different than

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1 a few years ago when they were trying to start from both  
2 ends.  
3 The main thing is when the Corps did their  
4 original EIS, because it designated wilderness -- and  
5 one of the key factors of wilderness by law is it  
6 doesn't have roads -- is that by law they couldn't  
7 actually -- we had no mechanism to authorize the road  
8 through wilderness, and that what's different this time.  
9 Congress had said we could.  
10 **JOHN MAXWELL:** That's not my question. My  
11 question is, they're coming out of Lenard's Harbor and  
12 they started in the northeast corner of the bay, they  
13 couldn't hook them together because of coming around the  
14 corner to the point of Lenard's Harbor there. And what  
15 is different now to make the road work?  
16 **HELEN CLOUGH:** Della or Mayor Mack or Gary?  
17 **DELLA TRUMBLE:** Are you talking about the  
18 northeast corner where the road --  
19 **JOHN MAXWELL:** Yes.  
20 **DELLA TRUMBLE:** The King Cove Corporation has  
21 basically said that if this land exchange goes through,  
22 we will give an easement --  
23 **JOHN MAXWELL:** That's not the question,  
24 though. They tried four years ago to make the road from  
25 King Cove all the way to the northeast corner --

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1       **STANLEY MACK:** Yeah. I can answer.  
2       **JOHN MAXWELL:** -- and they could not come  
3 around the corner.  
4       **STANLEY MACK:** And the reason being, that  
5 during the construction period, they ran into a -- what  
6 they call a slippery slope, where they were going to  
7 continue on with it. Had they not run into that  
8 slippery slope, they would have completed that road  
9 connection to the northeast corner. That would have  
10 been completed.  
11       But with that happening, they had to reroute  
12 the road and went through the whole process of  
13 permitting and then it had to be reevaluated and the  
14 cost went right out of sight. So we finally secured  
15 enough financing to complete the road to the northeast  
16 corner last year. We started construction. That's why  
17 it didn't happen this past year.  
18       **JOHN MAXWELL:** But how much money did they add  
19 to that?  
20       **STANLEY MACK:** Oh, Lord. I'm not too sure on  
21 that, John. I couldn't answer that.  
22       **JOHN MAXWELL:** Okay.  
23       **HELEN CLOUGH:** I'm sorry. I was -- I'm  
24 glad -- thank you for clarifying.  
25       **JOHN MAXWELL:** I was saying King Cove and

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1 everybody was thinking wilderness area --  
2       **HELEN CLOUGH:** Yeah.  
3       **JOHN MAXWELL:** -- but that was my question.  
4 Thank you.  
5       **HELEN CLOUGH:** Yeah.  
6       **HAROLD KREMER, JR.:** Yeah, you saying there  
7 was never -- that this was the first road going through,  
8 that's not true. There used to be a road almost right  
9 where you have the existing road. It used to go from  
10 Outpost Road -- what we call Outpost Road -- over,  
11 almost all the distance of that road.  
12       **HELEN CLOUGH:** We recognize that there were  
13 roads. But in terms of authorizing their use for this  
14 type of thing within wilderness is not allowed. Yeah,  
15 we recognize that wilderness --  
16       **HAROLD KREMER, JR.:** Well, you said that --  
17       **HELEN CLOUGH:** Oh, we know there were roads in  
18 this particular area, yeah.  
19       **HAROLD KREMER, JR.:** Oh, okay.  
20       **JOAN KLUWE:** And, Helen, one of the objectives  
21 is to use existing roads to the greatest extent  
22 practical.  
23       **HAROLD KREMER, JR.:** That's what I was going  
24 to suggest. If you have them already there, why not  
25 utilize them? They were shut down for some reason. I

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1 don't really know why -- the reason why they shut all  
2 them roads down. There was roads going all over the  
3 place here back in World War II, and they just chose to  
4 shut them all down.  
5       **HELEN CLOUGH:** Well, many were -- because they  
6 were designated wilderness, that they were not allowed  
7 to be used as roads generally.  
8       **HAROLD KREMER, JR.:** There's like, what, 70  
9 people here? Since I've been here in the '70s, there  
10 was like maybe 300 people here, down to 70 people. I  
11 mean, there's not enough wilderness there that -- you  
12 know, with the amount of people that you have here to  
13 really have any kind of impact, that I can see, on the  
14 environment unless you have a bunch of people . . .  
15       **HELEN CLOUGH:** If we're going to move into  
16 comments, I'm going to ask that we make sure we get it  
17 recorded and such. And we are recording everything,  
18 so . . .  
19       **JOHN ARKLEY:** Do we have a total number of  
20 species that are going to be affected by the road? Is  
21 there -- I realize you mentioned all the large mammals.  
22 What about the small mammals?  
23       **HELEN CLOUGH:** Joan, did we count a specific  
24 number of --  
25       **JOAN KLUWE:** It was analyzed by species group.

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1 And so there's large mammals, small mammals, fish,  
2 birds, migratory species. It's analyzed by species  
3 group.  
4       **JOHN ARKLEY:** So, in other words, no?  
5       **JOAN KLUWE:** I would say, in other words, yes.  
6       **JOHN ARKLEY:** Okay.  
7       **JOAN KLUWE:** But -- and it does break down  
8 ground squirrels and other things, too. But if you look  
9 for a heading of ground squirrels, you're not going to  
10 find it. If you look for a heading of small mammals,  
11 you'll find it.  
12       **JOHN ARKLEY:** Okay.  
13       **JOHN MAXWELL:** Along the same lines, why  
14 wouldn't -- you know, if that road was going to be  
15 affected, why would not all the other roads be affected  
16 the same way? I don't see any shortage of game across  
17 any of these roads. And I know the caribou kind of  
18 disappeared back a while ago, but that was due to a  
19 volcano going off and it coated the whole  
20 left-hand/right-hand valley where they normally graze.  
21 But other than that, I can't see of any shortage of  
22 anything here.  
23       **JOAN KLUWE:** And in many of the species,  
24 you'll find exactly that. The conclusion was that it  
25 would be a minor impact. It would be very similar to

1 existing conditions. And some of the other species, the  
2 biologists found that it would have a greater impact.  
3 So I encourage you to take a look at the table in the  
4 executive summary, and that provides a very --  
5 **JOHN MAXWELL:** Is that speculation or is  
6 that -- what is that?  
7 **JOAN KLUWE:** It's an analysis by biologists  
8 based on observations from the existing conditions,  
9 based on research that has been conducted over the years  
10 in this area, and sometimes they've looked at what has  
11 been impacted in other areas. So it's an analysis by  
12 professional biologists.  
13 **HELEN CLOUGH:** Other questions? Because I'd  
14 really like to move into --  
15 **HAROLD KREMER, III:** Just a quick question.  
16 My name is Harold Kremer, the III. This is junior.  
17 Why -- I understand why you want to have the  
18 guardrails or whatever you want to call them with the  
19 cable going down the road. Would it be U.S. Fish and  
20 Wildlife saying, we're going to give you this land for  
21 the road, but this is what you have to do? Is that --  
22 am I hearing that right?  
23 **HELEN CLOUGH:** You're hearing that -- yes and  
24 no. You're hearing that Congress told us, if we trade  
25 this land with the State -- excuse me -- we have to have

1 there.  
2 First off, I'd like to say thank you, because  
3 back in 1980 when you guys turned it into wilderness  
4 area, you didn't have the three studies. You just -- if  
5 you did, it wasn't here locally, so thank you for having  
6 the studies on this.  
7 The reason I was asking the question is  
8 basically, for every one foot of rise, you get three  
9 foot of drift. And if you're going to put something on  
10 the side of the road, you're just going to cause  
11 drifting problems. And if the road is intended to be  
12 used for safety and you're causing a drifting problem,  
13 it's an issue, you know, and that's why I was asking the  
14 question. Why would you put stipulations that they have  
15 to put barriers or anything on --  
16 **HELEN CLOUGH:** And that particular one is easy  
17 to answer, because it is what the law says. But what I  
18 would encourage -- and I know we've heard from several  
19 people -- if people have better ideas or other ideas of  
20 how to keep vehicles on the road -- I mean, there are  
21 numerous issues, issues with wildlife and stuff related  
22 to a barrier -- we would love to hear those, either here  
23 or written comments, whatever, because that's one of the  
24 many issues that we're struggling with in this project,  
25 to be very honest.

1 these mitigation measures and one of them is some kind  
2 of a barrier to keep the vehicles on the road, and they  
3 said "cable barrier" or something else. And actually  
4 what we're evaluating in the EIS is a chain barrier,  
5 similar to what we were looking at in the previous road  
6 projects.  
7 So, yeah, the road corridor, if it's  
8 exchanged, will come with strings attached to it, either  
9 in the form of agreement between us and the State or --  
10 you know, because that's what the law told us we had to  
11 do.  
12 **HAROLD KREMER, III:** So with the land change,  
13 are you guys getting stipulations with your land, too,  
14 if the land was to swap? I mean, like you can't go  
15 count animals on the land? I mean, it seems retarded to  
16 me. And, I'm sorry, but that's --  
17 **HELEN CLOUGH:** No. I appreciate your  
18 comments. But what I'd like to do, if we're going to  
19 ask rhetorical questions -- because you're really  
20 commenting and I really appreciate that, so I'd really  
21 like to make sure we just get it for the record.  
22 **HAROLD KREMER, III:** Up here?  
23 **HELEN CLOUGH:** Yes. Because I'm not going to  
24 respond -- I mean --  
25 **HAROLD KREMER, III:** Sure. I'll stand up

1 **HAROLD KREMER, III:** Well, if you get the road  
2 above the terrain, then you're not going to have the  
3 drifting problem. The snow and everything will blow  
4 over the top of it, for the most part. You'll still get  
5 some drifting, but not near as much. So just build your  
6 road taller, and they're not going to drive off a three-  
7 or four- or five-foot ditch, you know. I wouldn't think  
8 they would. I don't know.  
9 **JOHN ARKLEY:** The only comment I would have,  
10 Happy, have you walked that? Some of your fill is going  
11 to have to be 100 feet tall.  
12 **HAROLD KREMER, III:** There's -- yeah, there's  
13 parts, but I'm just saying, a chain link fence isn't --  
14 **JOHN ARKLEY:** No. She's talking about --  
15 **HAROLD KREMER, III:** I know. A cable fence.  
16 **HELEN CLOUGH:** Yeah. But, no, we've talked  
17 about snow fencing, and that has been expressed. I know  
18 the borough and their engineer has expressed the same  
19 concern to us.  
20 **HAROLD KREMER, III:** For me, the road would be  
21 strictly recreational. I support it for my neighbors.  
22 But, for me, it would be strictly recreational. I feel  
23 that the federal government, the U.S. Fish and Wildlife,  
24 is raping the King Cove and the State by getting 43,000  
25 acres for 206 acres of -- with stipulations. I just

1 want to go on the record by saying that, because I think  
2 it's wrong.  
3 I'm all about making a good deal. I'd buy a  
4 car and sell a car to make a profit, but I would -- I  
5 wouldn't be able to sleep at night if I went and made a  
6 profit like that. That's wrong.  
7 And you said on your study that the Natives  
8 have been in this area for years and years and years and  
9 there's different sites and stuff, geological studies.  
10 We basically took the land from them. Why are you  
11 trying to take more? That's my comment.  
12 But as far as the road issue, I would  
13 definitely look at different alternatives other than  
14 putting up things on the side to create more drifting.  
15 **HELEN CLOUGH:** Thank you.  
16 **HAROLD KREMER, JR.:** And I'd like to add a  
17 little note. That cable might be a problem for the  
18 people -- for the animals you're trying to protect.  
19 **HELEN CLOUGH:** Can you state your name for the  
20 record?  
21 **HAROLD KREMER, JR.:** Harold Kremer, Jr.  
22 **HELEN CLOUGH:** Thank you.  
23 Other people choose to speak?  
24 **UNIDENTIFIED SPEAKER:** It's okay, John, you  
25 can say something.

1 it. And I don't know if any of the King Cove group has  
2 any -- if you've engaged in much conversation about that  
3 or not.  
4 **STANLEY MACK:** It would be a public road owned  
5 and operated by the State of Alaska.  
6 **JOHN ARKLEY:** And the estimated cost to keep  
7 it maintained is? Do they have an estimate?  
8 **STANLEY MACK:** Based on these figures. I  
9 don't know where they came from.  
10 **JOHN ARKLEY:** I don't know either.  
11 **JOHN MAXWELL:** It's like \$149,000 a year of  
12 upkeep, I don't think so. I mean, you couldn't keep it  
13 plowed for that. I'm John Maxwell.  
14 Yeah, you've got \$149,000 on one and \$158,000  
15 on the other. Where did these numbers come from?  
16 Because if you flip over to running the boat back and  
17 forth, it's \$2 million.  
18 **UNIDENTIFIED SPEAKER:** They're buying their  
19 fuel in King Cove.  
20 **JOHN MAXWELL:** The numbers that are on here  
21 that are being put forth tonight don't make sense at  
22 all, so -- I think that's my biggest problem with this  
23 whole project.  
24 **HELEN CLOUGH:** I assume you think they're too  
25 low?

1 **HELEN CLOUGH:** If you have a question. I just  
2 want to make sure I'm getting the comments.  
3 **JOHN ARKLEY:** How long is the completion of  
4 this thing estimated to be?  
5 **HELEN CLOUGH:** The road?  
6 **JOHN ARKLEY:** The road. Is there an  
7 estimation on that?  
8 **HELEN CLOUGH:** I believe probably two seasons  
9 of construction, is our best estimate. And that would  
10 be up to the State and their contractor.  
11 **JOHN ARKLEY:** And the State would then be  
12 responsible for maintenance of it?  
13 **HELEN CLOUGH:** The State would own the land  
14 and they would own the road. How they chose to do the  
15 maintenance -- I mean, they could make an agreement with  
16 the city or the borough or -- you know, that's up to the  
17 State. I can't answer for them. But, I mean, it would  
18 be their land, so it would be their State road that they  
19 could do what -- you know, however they chose to  
20 handle --  
21 **JOHN ARKLEY:** So those decisions haven't been  
22 made yet?  
23 **HELEN CLOUGH:** No. I mean, it's kind of --  
24 it's a sequencing thing. I'm sure -- and unfortunately  
25 nobody from DOT is here, but I'm sure they thought about

1 **JOHN MAXWELL:** They're way too low. \$149,000?  
2 We pay -- how many guy are here in --  
3 **UNIDENTIFIED SPEAKER:** We burn easily 100  
4 gallons in an eight-hour day on the grader. Maybe a  
5 10-hour day, 100 gallons. And it would be all -- we  
6 couldn't keep dumping --  
7 **JOHN MAXWELL:** We can't get a mile and a half  
8 to the dump during the winter, and they're going to try  
9 to keep 30-some-odd miles open for \$149,000? You'd have  
10 to have people out there 24 hours a day, literally,  
11 plowing the roads -- I came out of Montana/Wyoming -- to  
12 keep them open. That's what you're going to have to  
13 have.  
14 **UNIDENTIFIED SPEAKER:** But the other option is  
15 a snow fence. That would help. But I don't know if  
16 that's feasible in this study. I don't know.  
17 **JOHN MAXWELL:** There's so much that's missing  
18 in here.  
19 **DELLA TRUMBLE:** Can I ask you a question?  
20 **JOHN MAXWELL:** Yes, ma'am.  
21 **DELLA TRUMBLE:** Realizing that this past  
22 winter was fairly extreme -- we all recognize that. But  
23 the whole state of Alaska, we had more snow probably  
24 than we've had in ten years. And when we look at these  
25 things, too, understand that, you know, this may be an

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1 exception. We may not have any snow for the next ten  
2 years.  
3 And I think just -- you'll get -- you live  
4 down here. You live down here. You know, King Cove, we  
5 get so much wind it usually blows it off. You'll get  
6 your snow berms here and there and you have to clear  
7 them, but like I say, this year was an exception. And,  
8 God help me, last time I remember this much snow, I was  
9 19 years old, when I was a kid growing up, and I'm 58  
10 years old. You know, there's no rhythm, rhyme, or  
11 reason to this. Some years you get snow and some years  
12 you don't --  
13 **JOHN MAXWELL:** I think we had this much snow  
14 in 2000 and 2001, if you want to check the records.  
15 But, you know, you're sitting here trying to  
16 compare apples and oranges on this, and I think that's  
17 really grossly unfair when you start talking the money.  
18 And the money, to me, is the bottom line.  
19 **UNIDENTIFIED SPEAKER:** Who pays for it?  
20 **JOHN MAXWELL:** I -- really. Who pays for it?  
21 And like Happy admitted -- and anybody here will know --  
22 they couldn't keep us open at the dump this year and  
23 years past. I mean, I remember almost every year having  
24 to be dug out if you went beyond the dump. They would  
25 plow to the radar site regularly, every year. So snow

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1 removal is going to be huge.  
2 And just so far as I'm concerned, I really  
3 think, in my opinion, it would be the boat from inside  
4 Lenard's Harbor to the Cold Bay dock with improvements  
5 to the dock. I think that's more reliable. You won't  
6 have to have people out there plowing and stuff like  
7 that. I just think monetarily and day in, day out,  
8 that's the best way to go. And I wish the numbers were  
9 a little closer.  
10 **HELEN CLOUGH:** Thank you for your comment.  
11 **UNIDENTIFIED SPEAKER:** Is there a breakdown of  
12 numbers in the draft?  
13 **HELEN CLOUGH:** Yes. There is much more detail  
14 in the document.  
15 **UNIDENTIFIED SPEAKER:** So you can go to the  
16 draft and get a slightly better idea of --  
17 **HELEN CLOUGH:** Get a slightly better idea.  
18 And if there's not enough numbers in -- you know, yours  
19 was a good example of a substantive comment about our  
20 numbers, that we'll have to go back and really look at.  
21 Gary?  
22 **GARY HENNIGH:** Gary Hennigh, city manager of  
23 King Cove. The number for maintenance that's in the  
24 draft EIS comes from Alaska DOT and the data that they  
25 have to maintain roads in a variety of environments in

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1 Alaska.  
2 The City of King Cove has 14 miles of road  
3 that we maintain and plow, and we've spend \$80,000 this  
4 year. So I beg to differ that these are not crazy  
5 numbers. There's a basis in fact. The ADTPF department  
6 has been very much involved in this process. Those  
7 numbers can be verified. Not every winter is the same,  
8 but they are realistic numbers. So don't let yourself  
9 believe that they're a bunch of hocus-pocus numbers  
10 because they're not.  
11 **JOAN KLUWE:** Helen, one other clarifying  
12 point. The numbers are not to maintain the road all the  
13 way from the City of King Cove all the way to Cold Bay.  
14 It's for an increment of road that would be built. So  
15 it's in addition to what already exists on each end.  
16 So what already exists on each end is already  
17 being paid for, and the analysis focuses on what would  
18 it take to maintain the new constructed area from the  
19 northeast terminal to Blinn Lake, so it's not 34 miles.  
20 **JOHN MAXWELL:** Well, they don't maintain  
21 anything from Blinn Lake. They don't maintain anything  
22 from the Y up here, this side. None of that is  
23 maintained, so that would all be -- and all through the  
24 top. And I could be wrong.  
25 Do you all maintain the road out to the

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1 northeast corner right now, Stanley?  
2 **STANLEY MACK:** It doesn't exist.  
3 **JOHN MAXWELL:** Okay. So how can it be  
4 considered in the numbers being maintained? It's all --  
5 **JOAN KLUWE:** But that's not proposed  
6 construction under this document.  
7 **STANLEY MACK:** One of the things that needs to  
8 be -- is this a town hall meeting or --  
9 **HELEN CLOUGH:** Yeah. I'm going to ask that we  
10 have a little structure.  
11 **STANLEY MACK:** Please.  
12 **HELEN CLOUGH:** It's a great discussion. But  
13 in terms of helping us with our document, I think we've  
14 captured some concerns. And I would encourage you to  
15 gives more, but I would like to give other people a  
16 chance to talk.  
17 So, Della.  
18 And then I'll ask us to be a little more  
19 organized if you want to speak. And to the extent that  
20 you can address our EIS with brief comments, I would  
21 really appreciate that.  
22 **DELLA TRUMBLE:** And it might be a good  
23 discussion for you guys after, to figure how to -- to  
24 understand a little better.  
25 **HELEN CLOUGH:** Yeah. We'll be happy to talk

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1 after.  
2 **DELLA TRUMBLE:** Anyway, I'm Della Trumble.  
3 And as many of you know, I've been a part of this  
4 process before. To be honest with you, since 1979. And  
5 for 30 years of my life or more -- is what my numbers  
6 are.  
7 I know many of you have heard time and time  
8 again how important this is for the community of King  
9 Cove. I understand your concerns in Cold Bay, and I  
10 feel it's very unfortunate that we haven't been able to  
11 work a lot closer.  
12 Because when I look at the list of the key  
13 issues and the issues that are on the -- let me get this  
14 right here -- the -- on this draft and the issues that  
15 can be mitigated, everything on this, the physical  
16 environment, can be mitigated with all the parties at  
17 the table. That includes Fish and Wildlife, this  
18 community, and King Cove, the State, the city, and the  
19 borough. There is no reason it can't be.  
20 The biological environment can also be  
21 mitigated if we put our heads together and work on it  
22 and be able to work on what everybody's concerns are.  
23 The social environment can be mitigated. We can work  
24 together on those if there's concerns of people hunting  
25 maybe where they're not supposed to. Those are the

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1 things that we can work together on.  
2 Let me tell you, there's one thing that cannot  
3 be mitigated, and that is the loss of lives and it  
4 continues today. You know how harsh our winter was.  
5 You saw the harrowing medevacs. And I'll give you --  
6 you know, I started last July when the scoping meetings  
7 started, when I was supposed to be traveling as part of  
8 the group, and I couldn't get from King Cove. I  
9 couldn't get to Sand Point.  
10 And then later in the day, the weather  
11 cleared, and I go to the airport to pick up my daughter  
12 and I watched that plane crash-land. And if you're a  
13 parent, if you ever see a -- I don't want a parent to  
14 ever see something like that again or have to go through  
15 driving down that runway at 100 miles an hour to make  
16 sure those people in that plane are okay or watching  
17 your five-month-old niece get into a helicopter with her  
18 mother and her father -- and they have another little  
19 daughter -- and to be thankful that they're alive today  
20 because nothing happened, including the health care  
21 provider who has five kids, four kids.  
22 We know you understand and you know what is  
23 going on here. I understand the concern with, you know,  
24 this community as -- you got the refuge, you've got your  
25 hunting lodges. And to some degree, you've got the

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1 guides. That's your living. But, God help me, I really  
2 have a hard time knowing that my ancestors walked these  
3 lands and lived on these lands far beyond anybody else  
4 being here. And to be put through what we've been put  
5 through is really disheartening.  
6 Listening -- in Sand Point last night, we had  
7 actually a very good public meeting. And we actually  
8 had a very good public in Anchorage where actually Orin  
9 Seybert said if his pilots did not have to fly between  
10 these communities, he would be very happy. He just --  
11 he said that is good.  
12 In Sand Point we listened to some of the  
13 pilots in talking about these two lagoons, the Kinzarof  
14 Lagoon and the Izembek Lagoon, and that they do not fly  
15 along the shoreline for the very purpose because you  
16 don't disturb the wildlife. They fly on the inside.  
17 Birds don't feed in there. Stanley knows. He can tell  
18 you. And everybody that lives here knows that.  
19 My thing is there's no reason that this issue  
20 cannot be worked on with these communities and U.S. Fish  
21 and Wildlife. And it breaks my heart every time we talk  
22 about taxpayers' dollars. Every time you bring in that  
23 Coast Guard, that's \$30,000. You bring in a C-130, you  
24 add to that number.  
25 Last year -- in the last 18 months there were

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1 22 medevacs out of King Cove. And when you look at  
2 those numbers and the health care and when those people  
3 get to Anchorage and the health care being worsened, you  
4 start adding that to taxpayers' dollars. Their health  
5 care is being paid by taxpayers' dollars.  
6 So take some of these into consideration  
7 because there's a human factor here that really is --  
8 it's just -- it's not that hard, you know. God help me,  
9 it's not that hard to do. And honest to God, we can  
10 work this out.  
11 We're happy to support your boat harbor  
12 when -- that's coming in time. And Mayor Stanley, every  
13 time we go to D.C., he meets with the Corps for a boat  
14 harbor. We can support you, but, God help us, we need  
15 your help here and we'd appreciate working together.  
16 Thank you.  
17 **HELEN CLOUGH:** Thank you, Della.  
18 Other people that would like to speak?  
19 **STANLEY MACK:** Yes, ma'am. I'll speak.  
20 Stanley Mack, mayor of the Aleutians East Borough. I'm  
21 going to speak in support of alternative two, because of  
22 the fact that it demonstrates it's the most inexpensive  
23 route to take.  
24 With taxpayers' dollars, we've operated the  
25 hovercraft. That is no longer an option because of the

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1 fact that it was draining in excess of a million and a  
2 half to 2 million a year out of the borough's  
3 pocketbook. The borough has to support the  
4 infrastructure of six communities in the area, and it  
5 can't do that when you've got a constant drain of  
6 \$2 million.

7 We've talked about taxpayers' dollars. The  
8 taxpayer dollar that would support this road is from  
9 everybody. And I think it's only -- it's very important  
10 to point out that in this document, this PowerPoint  
11 document, shows all the impacts in a very negative  
12 connotation. Everything in here is a negative impact on  
13 wildlife. It never talks about the positive impact that  
14 this road could have on human lives, a connection to  
15 economic development of both Cold Bay and King Cove and  
16 some of the neighboring communities. No one mentions  
17 that, but it does show it's a tremendous impact upon the  
18 wildlife.

19 Everyone in this room, I believe, knows that  
20 the wildlife, particularly the birds, are here only  
21 seasonally and they're only here for a short period of  
22 time. People are here all the time, and they're not  
23 going to go away.

24 I'd like to see Cold Bay come back to where it  
25 was 20 years ago. And it could happen with the

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1 infrastructure that's being developed today, but that --  
2 the infrastructure that's being put in place today with  
3 the incorporation of the alternative two, the most  
4 inexpensive project, I believe, could enhance the  
5 economic stability of Cold Bay, could grow it.

6 We see a decline in the population, simply  
7 because the government, again, has stepped in and said,  
8 we're going to cut you back. We're going to take the  
9 FAA and cut back on that group. We're going to take the  
10 Department of Transportation. We're cutting back on  
11 that, without asking the people in the community what do  
12 you really want. They're coming in and telling you what  
13 you're going to do, just like they did when they made  
14 wilderness.

15 But they happened to cut a little spur out of  
16 the wilderness for a road, and people quickly forget  
17 about that. And they can cut that little cherry stem  
18 out of there, too. But the King Cove Corporation, the  
19 State of Alaska, has gone overboard and given the land  
20 back.

21 In this study, it shows beautiful pictures of  
22 the wetlands, but everybody in this room has traveled  
23 out to Mortensens and looked at that wetland down there.  
24 And if that could have been incorporated into that  
25 PowerPoint, I think it could have had a positive impact

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1 on the determination of support for this road. And I  
2 just wish that we would get the support that we need.

3 The other alternative in here shows that  
4 possibly if there's no action, then we're going to go  
5 with a -- another marine link. Well, that's at a  
6 conceptual stage at this point in time. We had to come  
7 up with something because the hovercraft is not working.  
8 We all know that.

9 This other option is in a conceptual stage  
10 that possibly might work, but that's going to -- also is  
11 out of house and home because we need -- they had not  
12 put in the formula in here for the cost for the support  
13 for this other craft.

14 It says "icebreaking capabilities." I don't  
15 know where that came from, but you'd have to have  
16 something like they took up to Nome in order to get by  
17 this dock this winter, and every winter perhaps, for a  
18 period of time, a short period of time. We had an  
19 exceptional winter. But every winter that I can  
20 remember, we've always had ice. I seen the Coast Guard  
21 come in here one time and couldn't quite make it to the  
22 dock. So any type of harbor that we put in the area,  
23 that too will freeze.

24 So there's a lot of work to be going into  
25 this. So I'm saying that the best way -- the best bang

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1 for the buck -- of course if in fact there  
2 is infrastructure -- comments were made about taxpayer  
3 dollars. That has to be paid by taxpayer dollars also.

4 So the most economic way to provide for the  
5 connection between King Cove and Cold Bay and from Cold  
6 Bay to King Cove -- let's not forget that -- is the  
7 alternative two. Thank you.

8 **HELEN CLOUGH:** Others?

9 **JOSHUA KREMER:** My name is Joshua Kremer. I  
10 grew up here, and for a while I was an EMT. And the  
11 road is probably the best way to go, because I remember  
12 people coming in off the boat. And if they're coming in  
13 on a boat, that means the weather is too bad to fly. If  
14 the weather is too bad to fly, that boat is coming up  
15 and down five, ten feet at a time. Have you ever tried  
16 to take a wounded person off a boat? You're running the  
17 danger of you falling in the water. You're running the  
18 danger of the crew falling in the water. You're running  
19 the danger of the patient falling in the water.

20 A harbor won't do. I mean, it would, but if  
21 the weather is so bad that they're taking a boat, it's  
22 just going to crash up against the dock. The road is  
23 probably the easiest alternative to that and probably  
24 the cheapest. That's all I wanted to put in.

25 **HELEN CLOUGH:** Thank you very much.

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1 Others?  
2 **JOHN ARKLEY:** My name is John Arkley. I have  
3 only been coming out here since 1990, so I'm a relative  
4 newcomer obviously. But if anybody has walked that -- I  
5 haven't walked the whole thing, but I've probably walked  
6 three-quarters of it, with my legs, walked it. Building  
7 a road and maintaining a road out there, if you think  
8 from here to the dump is going to be hard, whoa, whoa,  
9 whoa, it's going to be way harder. It's going to be  
10 very, very hard.  
11 Who's going to be responsible for that?  
12 It's -- we're broke. This whole country is broke. We  
13 can't afford projects like this. We can't afford -- I'm  
14 sorry, but that's the way it is. We all make choices,  
15 whether we want to be here or not. So let's take  
16 responsibility.  
17 I realize losing a life is terrible. There's  
18 other options to maintain -- but maintaining a road out  
19 there, building a road out there, is going to be  
20 disastrous for the wildlife. And the wildlife is why  
21 the refuge is here. I realize the Natives have been out  
22 here forever and ever and that's grand, but, Stanley,  
23 there's brant in Izembek area and Kinzarof Lagoon right  
24 now.  
25 **STANLEY MACK:** Seasonal.

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1 **JOHN ARKLEY:** And if you don't believe me,  
2 we'll go out and look, right now. It's seasonal, but  
3 it's definitely -- definitely they're there. How many  
4 species are going to be impacted and can they be  
5 replaced? I mean, this is a disastrous thing,  
6 economically, any way you want to look at it. There's  
7 better routes, safer routes.  
8 **DELLA TRUMBLE:** John, can I ask you what --  
9 **JOHN ARKLEY:** Absolutely.  
10 **DELLA TRUMBLE:** What do you do in King Cove?  
11 Are you a guide?  
12 **JOHN ARKLEY:** In King Cove? No.  
13 **DELLA TRUMBLE:** In Cold Bay.  
14 **JOHN ARKLEY:** No.  
15 **DELLA TRUMBLE:** Okay. Because, as I recall, I  
16 think you were guiding or something.  
17 **JOHN ARKLEY:** No. I've never been a guide  
18 here. No. I just love it here.  
19 **HELEN CLOUGH:** Thank you.  
20 **HAROLD KREMER, III:** Just to make it simpler,  
21 I'll go by Hap.  
22 In regards to maintaining the road, I worked  
23 up in Deadhorse. I had the privilege of working up in  
24 Deadhorse, and they get pretty close to the same amount  
25 of snow and wind that we do. We might get a little bit

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1 more. On average, we're about -- correct me if I'm  
2 wrong -- about four feet of snow during the year. We  
3 wear our snow out more than anything because it blows to  
4 the left and turns around and blows to the right, so  
5 it's the same snow we're moving back and forth.  
6 In answer to John's question, yes, we had a  
7 hard time keeping the road open to the dump, and I  
8 brought that up earlier. There's certain time frames  
9 where it is difficult, but keep in mind that equipment  
10 that we're running was bought and purchased to maintain  
11 asphalt, not to be out here on the roads. It's not big  
12 enough to do the job that needs to be done.  
13 When I worked up in Deadhorse, we had the  
14 proper equipment. The road was raised a little bit.  
15 And like John said, there's valleys and stuff, and they  
16 have that going all the way up the Dalton Highway.  
17 We've all watched Ice Road Truckers. They have bigger  
18 equipment, bigger snowblowers, bigger plows.  
19 We maintained the first 50 miles of the Dalton  
20 Highway from Deadhorse south, and there was a few  
21 days -- not consecutively, but there were a few days out  
22 of the year and a half that I worked out there that we  
23 was not able to open it that day. More than anything is  
24 that the temperatures were below 35 degrees, we didn't  
25 like running our equipment because things break.

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1 We don't get that cold here. So as far as  
2 temperature-wise, I think --  
3 **UNIDENTIFIED SPEAKER:** Did you mean 35 below,  
4 Hap?  
5 **HAROLD KREMER, III:** What's that?  
6 **UNIDENTIFIED SPEAKER:** Did you mean 35 below?  
7 **HAROLD KREMER, III:** What did I say?  
8 **UNIDENTIFIED SPEAKER:** Thirty-five.  
9 **HAROLD KREMER, III:** Yeah, I'm sorry, 35  
10 below. Thanks.  
11 So we don't get that cold. So as far as  
12 equipment goes, I think it could run any day a week here  
13 temperature-wise. Visibility-wise, it would be  
14 questionable on a few days -- quite a few days.  
15 But you can buy the proper -- the bigger  
16 equipment to maintain the road. It's -- that's not  
17 really an issue. You get the right equipment, you can  
18 do the job. They've been doing it all over the nation.  
19 Look at Valdez, how much snow they got.  
20 **DELLA TRUMBLE:** We do it in King Cove. Our  
21 school opens at 8:30, but a lot of times it's open by  
22 10:00 because the --  
23 **JOHN ARKLEY:** Who's going to buy it? Who's  
24 going to finance it?  
25 **GARY HENNIGH:** The State of Alaska has made

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1 that commitment. That's a no-brainer. That's a done  
2 deal.  
3 **HELEN CLOUGH:** I'm going to ask that we focus  
4 on --  
5 **JOHN ARKLEY:** Okay. So --  
6 **HELEN CLOUGH:** And then when we break, we'll  
7 be happy to continue some dialogue.  
8 **HAROLD KREMER, III:** I will say the birds  
9 didn't have a problem with the people up there either.  
10 **HAROLD KREMER, JR.:** I would like to expound  
11 on what this young lady said a little while ago, because  
12 I've been out on search and rescue looking for a plane  
13 that went down out there because they had to go over to  
14 King Cove to pick up a medevac.  
15 The weather was white-out conditions. You  
16 couldn't get around. There was a nurse and a pilot and  
17 a patient on that plane, and they were all dying. They  
18 were all dead. They all died in a crash, a terrible  
19 crash out there, which the pilot never should have been  
20 out in, in the first place. So I can relate to what  
21 this lady is saying.  
22 Now, here's the bad part, everybody in this  
23 community was out looking for that plan. So everybody  
24 here was also in jeopardy. See, things like that  
25 snowball. When there's a life involved, it's a big

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1 thing. It's not a little thing.  
2 And I can remember when I first got here,  
3 these people were fighting for a road. And I could  
4 understand why as soon as I got here. Everybody in Cold  
5 Bay was fighting for that same road. And we've had to  
6 fight from then to now, right this particular point in  
7 time, to try to get a simple road that was here at one  
8 point.  
9 My point earlier was that there was a road  
10 that went almost the whole distance. People used to  
11 walk over here during the war and they used the same  
12 route all the time when they came over here. It's not  
13 an easy trip. It took them almost a whole day to do it.  
14 But when it's a life involved and you've got somebody  
15 out here that could be alive, you don't know -- and I  
16 got within 100 yards of that wreck and I couldn't even  
17 see it because of the -- you know, you put your hand out  
18 like this and you couldn't even see it. There.  
19 They should have never been out. They should  
20 have never flown or tried to fly out of King Cove. So I  
21 can sympathize with -- and it works both ways. There's  
22 two communities here that can help each other out in  
23 many, many, many ways.  
24 And there's no way you're going to hurt this  
25 environment. I don't care what any of your studies say

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1 or anything else, we drive these roads all the time and  
2 I have not noticed one bit of difference in them. The  
3 only thing that makes a big difference is when God makes  
4 a volcano erupt and blows ash all over the place and  
5 they can't feed there. Then they're going to move,  
6 migrate someplace else where they can. It's silly to  
7 think otherwise.  
8 We've got 70 people here, 70 right now. But  
9 we're going to have an impact on this environment?  
10 Short of setting off a nuclear bomb, I don't think  
11 anything would. I say we do a cleanup here, and that  
12 should have destroyed most of the wildlife, but it never  
13 did. Most of it is still here.  
14 So when it comes to a life, I say I'll take  
15 the life of a human being any time. And when you see  
16 people scattered out over 1,000 yards, a piece here and  
17 a piece there, maybe it would change anybody's mind.  
18 Thank you.  
19 **HELEN CLOUGH:** Are there other people that  
20 would like to speak? I'm not going to belabor it if  
21 there aren't other people that would like to speak. I  
22 mean, we're happy -- Joan and I are here to -- and if  
23 you have questions about the refuge in general, Leticia  
24 is your resident expert. And if you have questions of  
25 each other, obviously you are free to do that off

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1 record.  
2 Gary, did you want to say something?  
3 **GARY HENNIGH:** Yes. Gary Hennigh again. But  
4 my boss has asked that I read testimony, and that's  
5 Mayor Henry Mack from the City of King Cove.  
6 "Good evening. My name is Henry Mack." This  
7 is not really Henry, but Gary speaking for Henry. "I am  
8 mayor of King Cove. I'm also a grandfather, a father, a  
9 King Cove Corporation shareholder, Agdaagux Tribe  
10 member, and an Aleut. And in all these roles, I am here  
11 tonight to testify strongly in favor of the Izembek land  
12 exchange and alternative two, even though we could live  
13 with alternative three if we had to.  
14 "This road would finally allow our residents  
15 to have safe and dependable transportation access to the  
16 Cold Bay Airport, particularly in times of medical and  
17 health emergencies. In my mind, it comes down to  
18 respect for the residents of King Cove and Cold Bay.  
19 What is wrong with wanting to improve the quality of our  
20 life by having safe and dependable transportation access  
21 to the Cold Bay Airport?  
22 "I have skimmed through the draft EIS with a  
23 mixture of anger and renewed determination. As an Aleut  
24 and tribe member, I am angry that the report fails to  
25 measure the extreme environmental injustice that a

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1 no-road decision would mean to the residents of King  
2 Cove. As mayor, I am angry that the value of the lands  
3 that are proposed for this land exchange are not equally  
4 and fairly evaluated in the draft EIS so that it is easy  
5 for others to see how valuable the land is that we  
6 propose to exchange.  
7 "As a shareholder, I expected a more  
8 compelling comparison of the proposed exchange lands so  
9 that the members of the public could better understand  
10 and compare the values of the land proposed to be traded  
11 to the federal government in exchange for the lands from  
12 the State to build the road.  
13 "And given the poor record of the federal  
14 government in not including King Cove in past decisions  
15 about Izembek and our transportation accessibility, I  
16 thought it should have a little bit more positive  
17 attention that could have been brought to the fact that  
18 the King Cove Corporation is prepared to give lands back  
19 to the federal government, approximately 11,000 acres  
20 that the corporation was given as part of the  
21 fulfillment of the Alaska Native Claims Settlement Act.  
22 These are traditional lands used by our ancestors, and  
23 we are willing to relinquish them because this road  
24 means that much to us. That is not to say that we do it  
25 without some pain, because of the value of what we are

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1 giving away.  
2 "The non-road alternative in the draft EIS  
3 continues to include the hovercraft, as if it is a  
4 transportation solution for us. As the mayor of the  
5 Aleutians East Borough has already stated tonight, the  
6 hovercraft is not any kind of a solution to our  
7 struggles for transportation access. As the service is  
8 well aware, the AEB permanently pulled the hovercraft  
9 out of service and is on record that it is not a viable  
10 alternative to a road any time of the year.  
11 "We are all about wilderness and wetlands from  
12 King Cove. If you have been there, you know that both  
13 are a very short distance from where we live. We like  
14 our town. We are proud to have a thriving, economically  
15 healthy community that claims a long history of civic  
16 and cultural life. In order for that civic life to  
17 endure for future generations, we must have this road to  
18 Cold Bay. As its mayor, it is my job to say this to you  
19 every chance I get.  
20 "This road means we will have the sweet  
21 certainty that all parents want, which is that our kids  
22 can get to doctors and lives can be saved. This road  
23 means our relatives, our friends, particularly from Cold  
24 Bay, and coworkers will be able to come and go on a  
25 dependable basis. This road anchors us to a larger

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1 world in the best of all possible ways. Thank you."  
2 **HELEN CLOUGH:** Thank you, Gary.  
3 Anyone else have additional comments or would  
4 like to comment?  
5 **UNIDENTIFIED SPEAKER:** Come on, George, you've  
6 got to say something.  
7 **STANLEY MACK:** Just another comment to satisfy  
8 some of the debate that's going on between some of the  
9 folks here. I didn't like to see that happening,  
10 because that's not what the scoping meeting -- this EIS  
11 meeting is all about.  
12 But we, as Aleuts from King Cove, have been  
13 very concerned with life in general. To watch your  
14 loved ones suffer and can't possibly get to an airport  
15 is really, really sad. We -- you heard testimony about  
16 the snow and everything. Well, you never heard  
17 testimony saying we can make it with track vehicles.  
18 They're doing it all over the creation, and we do that.  
19 We've tried satisfying this whole issue with  
20 the expense of revenue that is coming in by taxpayers.  
21 The fishermen that pay the taxes. It didn't work. But  
22 just to give another community a chance to be able to  
23 reach the outside world or a better connection to the  
24 outside world is so important.  
25 As the mayor of the borough, I would make sure

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1 that that road was accessible by means of other -- plows  
2 or track vehicles. But it will happen. We can make it  
3 through there. As a matter of fact, you have the right  
4 to travel on the wilderness with a track vehicle when  
5 the snow is down there.  
6 So I just hope that the Secretary of the  
7 Interior will take into consideration, as well as the  
8 service take into consideration, that we have a  
9 transportation vehicle that can make it through the snow  
10 in case of an emergency. It's that simple, and it can  
11 happen. And I still prefer alternative two.  
12 **HELEN CLOUGH:** Thank you.  
13 **DELLA TRUMBLE:** I just have one, maybe,  
14 comment. When you look at the pink on the lands, and we  
15 all know that the pink belongs to the King Cove  
16 Corporation. But we've been approached about probably  
17 five years ago by a conservation group to purchase --  
18 prior to us coming up -- Stanley negotiating with U.S.  
19 Fish and Wildlife in D.C. on what this land exchange  
20 could look like.  
21 But the King Cove Corporation was approached  
22 by a conservation group to purchase the whole area that  
23 is now -- looking at the Mortensens. In fact, they  
24 wanted the whole area, all the way down to Thinpoint  
25 Lake. So if there's any misunderstanding about what the

1 value of that land is, they wanted to purchase it to  
2 turn it into wilderness, to give it to Fish and  
3 Wildlife.  
4 So, you know, we're giving up something that  
5 means a heck of a lot to us. A lot. This whole area  
6 means a lot to us and we know -- you know, we know how  
7 to -- you know, our renewable resources is as important  
8 to us as it is to anybody else, and I think more so to  
9 us than anybody else because it was all there for us.  
10 Thank you.  
11 **HELEN CLOUGH:** Anyone else?  
12 Thank you, Joan.  
13 She just reminded me of one more thing. We  
14 have some comment forms in the back. If you want to use  
15 this, you're welcome to grab one on the way out. And  
16 any of the materials we have, have all the ways to  
17 contact us, if you think of additional questions. And  
18 remember the comment period closes next Friday. And if  
19 you're mailing them, it's postmark, because I know it  
20 takes a while sometimes for the mail to come and go. So  
21 we will accept them.  
22 And I really thank you all for coming out and  
23 really appreciate it. And thank you for your comments.  
24 And please have some cookies and fruit and coffee.  
25 **JOAN KLUWE:** And if you haven't signed in,

1 please do sign in on the sheets over here by the door.  
2 Thank you very much.  
3 **HELEN CLOUGH:** Thank you.  
4 (Proceedings adjourned at 8:25.m.)  
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1 **REPORTER'S CERTIFICATE**  
2 I, **VALERIE MARTINEZ, RPR,** and Notary Public in  
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11 action herein contained.  
12 IN WITNESS WHEREOF, I have hereunto subscribed  
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U.S. FISH & WILDLIFE SERVICE  
IZEMBEK NATIONAL WILDLIFE REFUGE  
LAND EXCHANGE/ROAD CORRIDOR  
PUBLIC MEETING  
for the Draft Environmental Impact Statement

Taken May 9, 2012  
Commencing at 7:00 p.m.  
Volume I - Pages 1 - 25, inclusive

Taken telephonically in King Cove  
for the communities of  
False Pass and Nelson Lagoon

Reported by: Valerie Martinez, RPR

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Page 2

1                           A-P-P-E-A-R-A-N-C-E-S  
2 For U.S. Fish and Wildlife Service:  
3                   Helen Clough (telephonic)  
4                   Stephanie Brady (telephonic)  
5  
6 For URS Corporation:  
7                   Joan Kluwe (telephonic)  
8                   Taylor Brelsford (telephonic)  
9  
10 Taken by:  
11                  Valerie Martinez, RPR (telephonic)  
12  
13  
14 BE IT KNOWN that the aforementioned proceedings were  
15 taken at the time and place duly noted on the title  
16 page, before Valerie Martinez, Registered Professional  
17 Reporter and Notary Public within and for the State of  
18 Alaska.  
19  
20  
21  
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Page 3

1                           P-R-O-C-E-E-D-I-N-G-S  
2           **HELEN CLOUGH:** Hello. Has other people joined  
3 us?  
4           **TOM HOBLET:** False Pass is here.  
5           **HELEN CLOUGH:** Good evening. Thank you very  
6 much. I'm very sorry that -- this is Helen Clough from  
7 Fish and Wildlife -- that we could not get there in  
8 person. So we really appreciate you joining us by  
9 phone.  
10          So far on the line, I have Samantha Carroll  
11 from the State of Alaska listening in; Taylor Brelsford  
12 from URS Corporation, our contractor, listening in from  
13 Anchorage; Stephanie Brady, our project leader from  
14 California.  
15          And then here in -- we're actually in King  
16 Cove. I have borough mayor Stanley Mack; King Cove city  
17 manager Gary Hennigh; our project leader from URS  
18 Corporation, Joan Kluwe; and our court reporter, Valerie  
19 Martinez, who will be taking down all the comments  
20 provided.  
21          And would you like to introduce the people  
22 that we have in False Pass?  
23           **TOM HOBLET:** Yes. Actually, they're just --  
24 they're migrating this way. We had a potluck planned  
25 for you guys this evening, so we had to go and eat that.

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1           **HELEN CLOUGH:** Well, good.  
2           **TOM HOBLET:** But we have Terry Murphy here;  
3 Ken Parker, our VPSO; Chris Emrich, our city clerk; and  
4 myself so far.  
5           **HELEN CLOUGH:** Great. Thank you very much.  
6           Do we have anybody from Nelson Lagoon on the  
7 line yet?  
8           **UNIDENTIFIED SPEAKER:** Yeah, we've been on  
9 here.  
10          **HELEN CLOUGH:** Oh, great. Would you like to  
11 introduce the people that are there as well?  
12          **UNIDENTIFIED SPEAKER:** Yeah. There's Mark  
13 McNeley, myself, and Samantha McNeley.  
14          **HELEN CLOUGH:** Great. Thank you very much for  
15 joining us. And, again, I am truly sorry that we could  
16 not get to the other communities this afternoon. But  
17 you live here and you know what the weather can be like.  
18 And as you probably know, the government has a lot of  
19 rules about flying.  
20          So what I'd like to do this evening, if  
21 everybody is ready, is briefly describe our  
22 environmental impact statement and where we are in the  
23 process, tell you just a little bit, and then if there  
24 are any general questions, I will answer. And then what  
25 we'd like to do is hear from you.

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1           And as individuals choose to speak -- I know  
2 on the phone it will be a little difficult to recognize  
3 people, but if you could just state your name before you  
4 speak so that our court reporter can make sure we get  
5 your comments.  
6           So, again, I'm Helen Clough, and I'm the head  
7 of planning for Fish and Wildlife Service in Alaska.  
8 Stephanie Brady is also on the line with me, and we are  
9 in charge of the technical side of preparing the  
10 environmental impact statement, which is a draft  
11 currently out for public review.  
12          I hope most people in the mail got a copy of  
13 the summary, the blue book, and then there was also a  
14 compact disc sent out, which has the full document,  
15 which, if you were to print it out, is about 1100 pages.  
16 Everything can be found on our web site. If you need  
17 the web address -- the comment period actually ends next  
18 Friday. And of course people can make comments verbally  
19 tonight, they can be e-mailed to us, or they can be  
20 mailed or faxed. And if you mail them, it's the  
21 postmark date of next Friday. We certainly understand  
22 how mail works everywhere, and especially in Alaska,  
23 sometimes it will take a while to get to us and we  
24 understand that.  
25          So we had had a PowerPoint presentation, and

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1 I'm not about to read you the whole thing without the  
 2 slides, but I just want to tell you a little bit about  
 3 the project to put things in context.  
 4 And so Congress passed, in 2009, a law. And  
 5 part of that called for us to evaluate this land  
 6 exchange that involves the King Cove Corporation, the  
 7 State of Alaska, and the Fish and Wildlife Service. And  
 8 the purpose of the land exchange, if it is approved by  
 9 the Secretary of the Interior, would be for a  
 10 construction of a road between King Cove and Cold Bay,  
 11 primarily for health and safety access and primarily for  
 12 noncommercial purposes. It would allow the  
 13 transportation of people, but not like fish or other  
 14 commercial commerce.  
 15 The land exchange itself would involve a  
 16 little over 200 acres of land for a road corridor within  
 17 the Izembek Refuge and wilderness from the Fish and  
 18 Wildlife Service, that would go to the State. The State  
 19 would also acquire about 1600 acres on Sitkinak Island,  
 20 again from Fish and Wildlife Service. In exchange for  
 21 that land, the State would give the refuge almost --  
 22 well, a little over 43,000 acres of land on the Alaska  
 23 Peninsula near the refuge and within the boundary of the  
 24 Alaska Peninsula Refuge. And those lands, if they come  
 25 to the refuge, would also be designated wilderness.

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1 The King Cove Corporation would give up over  
 2 13,000 acres of their land near Mortensens Lagoon and  
 3 Kinzarof Lagoon, and those would come to the Fish and  
 4 Wildlife Service. King Cove would also give up a  
 5 selection of over 5,000 acres within Izembek Refuge and  
 6 wilderness and select lands outside the refuge for that  
 7 5,000 acres.  
 8 And so that's the basic thing that we are  
 9 evaluating in this environmental impact statement. King  
 10 Cove Corporation, the City of King Cove, the Aleutians  
 11 East Borough, the Corps of Engineers, the State of  
 12 Alaska, the Federal Highway Administration, are all  
 13 cooperators on this environmental impact statement with  
 14 Fish and Wildlife Service. But in the end, the decision  
 15 on the environmental impact statement belongs with the  
 16 Fish and Wildlife Service. And Jeff Haskett, our  
 17 regional director, will be the person making that  
 18 decision. The final decision on the project will be  
 19 made by the Secretary of the Interior, who currently is  
 20 Ken Salazar.  
 21 So some other things that we have to look at  
 22 as we look at this land exchange and the road that were  
 23 also in the law, we have to look at having, they said, a  
 24 cable barrier or some kind of barrier alongside the road  
 25 to keep vehicles on the road. We need to design the

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1 road corridor to minimize the impact on the refuge and  
 2 its resources. We would need to have what they call a  
 3 mitigation plan, which is a plan for avoiding and  
 4 minimizing or compensating for impacts, especially to  
 5 wildlife, wetlands. We are required to identify  
 6 transferring the minimum amount of federal land that  
 7 would be required for a road; to use existing roads as  
 8 much as we can.  
 9 Just a real brief background on Izembek  
 10 Refuge. I'm sure most of you know this. It was  
 11 originally established as Izembek National Wildlife  
 12 Range in 1960. Congress renamed it the Izembek National  
 13 Wildlife Refuge in 1980 when ANILCA passed, and at that  
 14 time they designated most of the refuge as wilderness.  
 15 Of course the refuge was created to protect  
 16 wildlife, including bears, caribou, and many migratory  
 17 birds, especially brant. Over 98 percent of the world's  
 18 population of brant come to Izembek Lagoon every fall.  
 19 And the international importance -- not just national,  
 20 but the international importance of the refuge has been  
 21 recognized in a number of special designations.  
 22 When we began this process, we came out and  
 23 conducted scoping meetings in local communities, and we  
 24 had better luck that time at actually getting to Nelson  
 25 Lagoon and False Pass. And of course the residents of

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1 King Cove have been advocating for a road link between  
 2 the two communities here for over 25 years, primarily  
 3 for health safety, to get people out in times of medical  
 4 emergency, and also as a quality of life issue, having  
 5 more affordable and reliable transportation to the  
 6 airport at Cold Bay.  
 7 As we began scoping for this environmental  
 8 impact statement, a number of issues were identified:  
 9 Providing for the health and safety for the local  
 10 community; a concern over the cost of the -- you know,  
 11 at that time the hovercraft was proposed to be in  
 12 operation and the cost that had been experienced running  
 13 it; concern that if a road was built, impacts to soils,  
 14 wetlands, wildlife. And for many, because this would be  
 15 a road going through what is a designated wilderness  
 16 area, we've also heard -- especially from some of the  
 17 environmental groups -- a great concern about impacts to  
 18 wilderness.  
 19 The environmental impact statement looks at  
 20 five different alternatives. By law we're required to  
 21 consider a no-action alternative. And what that means  
 22 is continuing the current situation, which of course has  
 23 been quite fluid. At the time we started working on  
 24 this environmental impact statement, the borough had  
 25 planned to resume three-day-a-week seasonal hovercraft

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1 operation. And right before we thought we were going to  
2 put the draft document out, the borough notified us that  
3 they had decided they were not going to be able to do  
4 that and would in fact not operate the hovercraft  
5 between King Cove and Cold Bay anymore.  
6 And their current plan, if the Secretary of  
7 the Interior does not improve the road, would be to try  
8 and acquire -- and this is just a conceptual plan at  
9 this time, but acquire some kind of a smaller ferry --  
10 landing-craft-style ferry, perhaps that could use the  
11 facilities that were originally constructed for the  
12 hovercraft.  
13 We are looking at two different road  
14 alternatives. One would run closer to Kinzarof Lagoon  
15 and the other one kind of runs across the middle of the  
16 isthmus area of the refuge.  
17 We also have two other alternatives. One  
18 would be one with hovercraft running between the  
19 communities six days a week, and that was actually the  
20 alternative selected when the Corps of Engineers did the  
21 original King Cove access project EIS back in 2003. And  
22 then we're also evaluating an alternative that would  
23 have a ferry. And that also came from that original  
24 environmental impact statement that was done by the  
25 Corps.

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1 So there's five alternatives we're  
2 considering. I'll talk just for a minute about the two  
3 road alternatives. They're fairly similar, though one  
4 alternative has about -- the more northern road  
5 alternative has about two more miles of road, 19 and a  
6 half miles versus 21 and a half miles. The longer road  
7 actually goes through a little less wetlands. And  
8 because of the terrain, it would actually disturb a  
9 little less acres of land. The construction cost  
10 differences -- estimates between these two roads are  
11 about \$2 million. The southern road would cost about  
12 \$21 million and the northern road \$23 million to build.  
13 Where we are in the EIS process right now, of  
14 course, we're doing these public meetings. As I said a  
15 few minutes ago, the comment period ends next Friday.  
16 People can comment, as I mentioned -- you know, you can  
17 speak tonight, if you're comfortable doing that, and we  
18 will take -- you know, we have a court reporter taking  
19 everything down that's said and we will consider all  
20 those comments.  
21 You can also submit comments by e-mail, and  
22 you can also submit comments in writing, you know,  
23 regular, old-fashioned mail, or we could also accept a  
24 fax, if that works for people.  
25 After the public comment period closes, our

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1 contractor, URS Corporation, will take all the comments  
2 we've received in writing and from the public meetings  
3 and prepare a report summarizing those comments. And  
4 then the full team of people that have been working on  
5 them, we have to prepare responses to all the  
6 substantive comments. And that's where somebody points  
7 out that they don't agree with our analysis.  
8 We know the King Cove group will be submitting  
9 comments from a consultant taking exception to some of  
10 the analysis we've prepared on impacts on birds, so  
11 we'll be looking at that and saying, oh, yes, you're  
12 right or, no, we don't agree with you for these reasons.  
13 I know last night we were asked a number of questions  
14 about where some of the road maintenance costs came, so  
15 we'll definitely be taking another look at those and  
16 maybe providing additional explanation of where -- what  
17 those figures are. Or if they're not correct, we'll be  
18 correcting them.  
19 So those are the kind of comments that in the  
20 final EIS we would be providing responses to. Other  
21 comments, like people say, I like alternative two more  
22 than alternative three, we'll summarize those and kind  
23 of make a list, you know, not of the people, but the  
24 numbers -- relative numbers. But, you know, just to  
25 help the decision-makers hear what people said. So if

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1 it's an opinion, we don't have so respond to it, but we  
2 certainly consider it.  
3 A final EIS, which is by regulation supposed  
4 to have a preferred alternative, will come out probably  
5 in late October, followed by the Fish and Wildlife  
6 Service decision. It's the first of two decisions. And  
7 you can think of our decision as -- would be the Fish  
8 and Wildlife Service's recommendation to the Secretary  
9 of the Interior. And that will happen probably towards  
10 the latter part of December. Probably right around  
11 Christmas.  
12 And after that -- and I really don't know how  
13 soon. I assume it will be fairly soon. But whether  
14 it's a week or a month, I do not know -- the Secretary  
15 of the Interior will make the final decision. And he  
16 will either find that the road is in the public interest  
17 and -- and I assume if we recommended one road corridor  
18 over the other, he'd probably go along with that, but I  
19 honestly don't know.  
20 And he will consider our recommendations, the  
21 Fish and Wildlife Service. He'll also consider his  
22 responsibilities as Secretary of the Interior for tribal  
23 trust and basically anything else, I think, he wants to  
24 consider that would be -- you know, what is the greater  
25 public interest in -- you know, and he has to find that

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1 the road is in the public interest to approve the land  
2 exchange. And so he will be the final decision-maker.  
3 And I think that will probably, again, happen  
4 in late December, but I am not sure, because this is  
5 something that was, again, required in the law and it's  
6 not anything we typically do. Normally, if we do an  
7 environmental impact statement, we are the  
8 decision-maker. And in this case, our decision is only  
9 a recommendation.

10 So with that -- and I appreciate you listening  
11 to me talk without any visuals to look at -- I will open  
12 it up and ask if there are any questions. And if -- you  
13 know, I'll try and answer your questions. And I have  
14 Joan here and Stephanie can join me, if we can answer  
15 the questions. And then we would like to move in and  
16 hear what people's thoughts are on the project.

17 And, please, when you speak, let us know your  
18 name so the court reporter can get your name as well.  
19 And I really thank you for your attention.

20 So are there any questions?  
21 Are there people who would like to comment on  
22 the project, since I'm hearing no questions?

23 **TOM HOBLET:** This is Tom. I live in False  
24 Pass. What's the concerns from the Fish and Wildlife  
25 Service? I know you say migratory birds and all that,

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1 but you don't know the impact of the road to the -- you  
2 know, to the bird population through Izembek National  
3 Wildlife Refuge?

4 **HELEN CLOUGH:** We -- the analysis suggests  
5 that through time -- and how I characterize the impacts  
6 on birds and other wildlife, is we see them emanating  
7 off the road, kind of radiating out from it. The road  
8 itself would have fairly limited impacts, but it's use  
9 occurring off the road -- you know, we know there's some  
10 potential for off-road vehicle use and people expanding  
11 into areas and people having access to areas more easily  
12 than they've had in the past.

13 And so, you know, our best analysis -- I am --  
14 personally, I'm not a biologist, but the biologists  
15 participating in the analysis, which included several  
16 people that work for Fish and Wildlife, was that, you  
17 know, it could have some adverse effects, especially on  
18 brant, on Emperor geese, on tundra swans, were some of  
19 the bird species we were most concerned about, and of  
20 course migratory birds. And many of the tundra swans  
21 around here don't migrate, which is a pretty unique  
22 situation. They're here all year. So those are some of  
23 the species we're most concerned about.

24 In terms of caribou, we recognize that we  
25 really don't know. In some parts of the country --

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1 State, caribou don't like to cross roads. And other  
2 places, they do. And we know that they certainly have  
3 crossed the existing roads in this area, so we  
4 acknowledge that we're not sure what the impacts to  
5 caribou would be. Some species, like bears, right along  
6 the road, there could be some potentials for impacts.  
7 We don't think they would occur across a broad area.  
8 So that's my very quick summary. I hope that  
9 answers your question a little bit.

10 **TOM HOBLET:** I guess it does somewhat, but, I  
11 mean, I know -- it seems like the last drawing I saw,  
12 that road was drawn mostly by the edge of the lagoon, so  
13 where would that caribou be crossing that road? I can't  
14 see that, I guess.

15 **HELEN CLOUGH:** Well, there's two corridors.  
16 And the more northern corridor kind of runs across the  
17 middle of the isthmus. And I think we anticipate that  
18 that one would be more in the area used by caribou,  
19 though. I think the -- none of the roads would be right  
20 along the edge of the lagoon, so caribou could cross  
21 both -- you know, either one if it were built.

22 **TOM HOBLET:** Okay. What's -- okay. Who's in  
23 opposition to this? Which groups are in opposition to  
24 this? Can they speak to their opposition of the road?

25 **HELEN CLOUGH:** I don't know that there's any

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1 representatives of those groups present, but just -- the  
2 main opposition that we've heard and that we heard in  
3 the Anchorage meeting was from some of the environmental  
4 groups. The Wilderness Society is very concerned, I  
5 think, partially because of the precedent. There have  
6 been other lands taken out of wilderness for various  
7 reasons, but this is kind of going through the middle of  
8 an area versus it's usually a little piece carved off on  
9 the side.

10 So the Wilderness Society has been one  
11 organization, the Defenders of Wildlife. I think groups  
12 that have offices within Alaska, and we certainly heard  
13 from people that are in Alaska that have concerns. But  
14 many of -- you know, right now I think the most comments  
15 we're getting -- and of course most people don't comment  
16 until right at the end of the comment period, but are  
17 coming from some letter-writing campaigns organized. I  
18 believe -- I'm looking at Joan -- the Sierra Club is one  
19 of them.

20 **JOAN KLUWE:** Alaska -- the Wilderness Society.  
21 There's also Alaska Wilderness League, Center for  
22 Biological Diversity. There's a number of environmental  
23 organizations --

24 **GARY HENNIGH:** Audubon.  
25 **HELEN CLOUGH:** Audubon.

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1       **JOAN KLUWE:** A number of environmental  
2 organizations are interested in the project.  
3       **HELEN CLOUGH:** And I mean -- so those are the  
4 ones we've heard so far, but we have not completed  
5 analysis and the comment period is still open, so we  
6 will hear from others, you know, both supporting and  
7 opposing, I assume. At the Anchorage public meeting,  
8 about half the people spoke in favor of the project and  
9 about half the people spoke in opposition.  
10       **TOM HOBLET:** Okay. But, I guess, I don't  
11 know, you know, people -- probably the people that are  
12 in opposition to this road don't even live in the area.  
13 And you guys -- it looks like you got firsthand  
14 information about how our weather could be out here in  
15 the middle of May, and you think about that in the  
16 middle of March or -- February or March when there's  
17 people trying to get out of a community, sick people.  
18       **HELEN CLOUGH:** Thank you.  
19       Further comments or questions?  
20       **TERRY MURPHY:** My name is Terri Murphy. I  
21 used to work in medical in King Cove. I've done  
22 numerous medevacs. I've worked in Cold Bay. You guys  
23 have miles and miles and miles of road all over the  
24 creation over there. What difference is this one  
25 20-mile stretch of road going to make?

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1       **HELEN CLOUGH:** Thank you. Anything else to  
2 add to that? I mean, I'm not in a real position to  
3 answer. I take that as a comment strongly in support of  
4 the road.  
5       **TERRY MURPHY:** Yeah, absolutely.  
6       **HELEN CLOUGH:** Yeah.  
7       **TERRY MURPHY:** It's just been going on forever  
8 and, you know, I -- I'm just -- you know, I think they  
9 need the road.  
10       **HELEN CLOUGH:** Thank you.  
11       **TOM HOBLET:** All the things that we need to --  
12 you know, put human life ahead of some bird life, that's  
13 for sure. I'm married out of King Cove, my wife is from  
14 King Cove, and she has family there. And I have a lot  
15 of family and friends there, so, you know, we're in  
16 favor of the road.  
17       **HELEN CLOUGH:** Could we get your name please?  
18       **TOM HOBLET:** My name is Tom Hoblet.  
19       **HELEN CLOUGH:** Okay. Are there other people  
20 that would like to speak or ask questions?  
21       **MARK MCNELEY:** Yeah. This is Mark McNeley,  
22 Nelson Lagoon. Not too many people showed up here, but  
23 one thing for sure is that everybody here agrees with  
24 Terry and Tom and pretty much everybody else in the  
25 area. We all have family in King Cove and friends. And

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1 about the only time you really ever hear about anything  
2 that's -- when it comes to attention is when there's a  
3 medevac and then, you know, it's a matter of life and  
4 death. And then -- but, you know, unless something like  
5 that happens, nobody cares.  
6       I mean, like Tom said, you're putting, you  
7 know, the people's health and whatnot over a bird  
8 population and whatnot. But just for the record, that  
9 Nelson Lagoon is for the road.  
10       **HELEN CLOUGH:** Thank you very much. We  
11 appreciate your comments.  
12       **THE REPORTER:** Can you ask Tom to spell his  
13 last name?  
14       **HELEN CLOUGH:** Tom, could you spell your last  
15 name for our court reporter? She asked me to ask you  
16 that.  
17       **TOM HOBLET:** H-o-b-l-e-t.  
18       **HELEN CLOUGH:** Thank you very much. In fact,  
19 Mayor Mack just spelled it for us, too, so thank you  
20 very much.  
21       Other comments or questions? It's fine if  
22 people don't want to speak. I know it's awkward to have  
23 to talk in a phone. I sure wish we would have been able  
24 to -- and, False Pass, I especially thank everyone there  
25 for having -- and I hope you enjoyed the potluck. We

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1 missed it. And I hope we'll be able to get there again,  
2 if not on this project, for something -- I don't think  
3 we'll have more meetings for this project, but for  
4 something else. And I really --  
5       **TOM HOBLET:** Okay. Yeah. There's 11 of us  
6 here -- 13 of us here in the room right now and we're  
7 all in favor of this project. So that's where that is  
8 from False Pass.  
9       **HELEN CLOUGH:** Thank you very much. We  
10 appreciate hearing that.  
11       So are there other --  
12       **JOAN KLUWE:** Names?  
13       **HELEN CLOUGH:** Would you mind providing your  
14 names, the names of the people that are there, and that  
15 way we can have those on the record? If that would be  
16 okay with you guys, that would be very helpful to us.  
17       **RUTH HOBLET:** You have Terry Murphy and Tom  
18 Hoblet. You have Billy Shellikoff, my name is Ruth  
19 Hoblet, Travis Hoblet, Chris Emrich, Chris Yatchmenoff,  
20 Nicole Hoblet, Carmen Newman, Carleen Hoblet, Ken  
21 Parker, Melanie Hoblet, Hazel Yatchmenoff, and Ellie  
22 Hoblet.  
23       **HELEN CLOUGH:** Thank you very much. I  
24 appreciate that. And we have our resident expert here  
25 that will give us the spellings of the names. That's

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1 Mayor Stanley Mack, who is grinning at me.  
 2 I really appreciate you all turning out and  
 3 sharing your opinions. It's very helpful for us.  
 4 And then did we have all the names from Nelson  
 5 Lagoon? I know we had less people there.  
 6 **SAMANTHA MCNELEY:** Yes. That was all that  
 7 attended.  
 8 **HELEN CLOUGH:** Okay. Does anybody else have  
 9 anything else they'd like to say or ask of us? If not,  
 10 I don't want to keep people out.  
 11 If not, again, I thank you very much for being  
 12 flexible and for participating and for helping us out  
 13 with the project. We really appreciate it and we  
 14 appreciate your time and your interest.  
 15 And, again, I assume everybody -- if you have  
 16 internet access, you can just Google "Izembek EIS" and  
 17 our web site will pop up and then you can find the  
 18 information or you can call the refuge office here in --  
 19 over in Cold Bay or if you have questions or need  
 20 additional information from us.  
 21 So if there's nothing else, we'll let you guys  
 22 have the last word to make sure we haven't missed  
 23 anything and people can go on their other business and  
 24 enjoy their evening. And, again, thank you very much  
 25 for coming out.

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1 **TOM HOBLET:** Okay. Thank you from False Pass.  
 2 I guess we're done.  
 3 **HELEN CLOUGH:** Okay. You're welcome.  
 4 **UNIDENTIFIED SPEAKER:** We've got some  
 5 smart-crossing caribou.  
 6 **HELEN CLOUGH:** I know. I have seen them right  
 7 by the road myself in my last visit to the area. Well,  
 8 actually, almost on the runway in Cold Bay.  
 9 So if there's nothing else, I thank you all  
 10 for your time and attention. And if people want to  
 11 submit written comments, we look forward to receiving  
 12 those as well.  
 13 Anybody here, Mayor Mack or Gary, want to add  
 14 anything?  
 15 **GARY HENNIGH:** Well -- Gary, King Cove.  
 16 Certainly to Tom and the group in False Pass and Mark  
 17 and the group in Nelson Lagoon, your comments are  
 18 heartfelt by the people I work for, for the city. We  
 19 really appreciate the support that you all have had  
 20 right from the start. You all know the issues because  
 21 you live the issues with the folks in King Cove. So we  
 22 truly appreciate your willingness to go on record to  
 23 voice your support.  
 24 So a big thanks to all of you from Mayor Henry  
 25 Mack, who is not able to be with us tonight, but he and

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1 the council -- and Della, who also couldn't be with us  
 2 tonight because she's sick. We barely got her back in  
 3 Cold Bay today in one piece. So she's staying home,  
 4 trying to get better for what we hope is a very big  
 5 turnout tonight -- tomorrow night here in King Cove.  
 6 So thanks, once again, and I will certainly  
 7 share with the people in King Cove the type of support  
 8 that we got from all of our friends and relatives in  
 9 False Pass and Nelson Lagoon.  
 10 **STANLEY MACK:** I share Gary's comments. Thank  
 11 you guys for coming out tonight. I really appreciate  
 12 it.  
 13 **TOM HOBLET:** Okay. Thank you guys. We're  
 14 signing off.  
 15 **HELEN CLOUGH:** Okay. Thank you very much and  
 16 everybody have a good evening.  
 17 (Proceedings adjourned at 7:33 p.m.)  
 18  
 19  
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 24  
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1 **REPORTER'S CERTIFICATE**  
 2 **I, VALERIE MARTINEZ, RPR, and Notary Public in**  
 3 **and for the State of Alaska do hereby certify:**  
 4 **That the proceedings were taken before me at the**  
 5 **time and place herein set forth; that the proceedings**  
 6 **were reported stenographically by me and later**  
 7 **transcribed under my direction by computer**  
 8 **transcription; that the foregoing is a true record of**  
 9 **the proceedings taken at that time; and that I am not a**  
 10 **party to nor have I any interest in the outcome of the**  
 11 **action herein contained.**  
 12 **IN WITNESS WHEREOF, I have hereunto subscribed**  
 13 **my hand and affixed my seal this 22nd day of May, 2012.**  
 14  
 15  
 16  
 17  
 18 **VALERIE MARTINEZ,**  
 19 **Registered Professional Reporter**  
 20 **Notary Public for Alaska**  
 21 **My Commission Expires: June 22, 2014**  
 22  
 23  
 24  
 25

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U.S. FISH & WILDLIFE SERVICE  
IZEMBEK NATIONAL WILDLIFE REFUGE  
LAND EXCHANGE/ROAD CORRIDOR  
PUBLIC MEETING  
for the Draft Environmental Impact Statement

Taken May 10, 2012  
Commencing at 7:00 p.m.  
Volume I - Pages 1 - 78, inclusive

Taken in  
King Cove, Alaska

Reported by: Valerie Martinez, RPR

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1                                   A-P-P-E-A-R-A-N-C-E-S  
2 For U.S. Fish and Wildlife Service:  
3                   Helen Clough  
4                   Stephanie Brady (telephonic)  
5  
6 For URS Corporation:  
7                   Joan Kluwe  
8  
9 Taken by:  
10                  Valerie Martinez, RPR  
11  
12  
13 BE IT KNOWN that the aforementioned proceedings were  
14 taken at the time and place duly noted on the title  
15 page, before Valerie Martinez, Registered Professional  
16 Reporter and Notary Public within and for the State of  
17 Alaska.  
18  
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1 Court Reporters who will be taking down the meeting and  
2 preparing a transcript. And so I'll ask, when you  
3 speak, if you'd come up -- and you're welcome to stand  
4 or sit -- but if you'd come up and be by the phone so  
5 Valerie can hear you but also so that the folks  
6 listening in on the phone can hear you. I would  
7 appreciate that.  
8                  But I'm just going to run quickly through some  
9 slides. There are copies of this PowerPoint  
10 presentation. There's a lot of detail in the slides,  
11 and I'm not going to talk to every one. But I would  
12 just like to give a quick overview and then we'll take a  
13 little bit of time if you have some specific questions.  
14 And then the main reason we're here is to hear from you,  
15 so I'm not going to talk very long. I want to hear what  
16 you have to say.  
17                  As you can see, all the cooperating agencies.  
18 We have King Cove, the city, the tribe, Agdaagux Tribe,  
19 the Belkofski Tribe; the borough; the State, the Corps  
20 of Engineers; Federal Highway Administration; and the  
21 State of course.  
22                  Why we're looking at this land exchange. It  
23 was a deal that's been discussed for many years. But  
24 back in 2009, Congress passed this law and they told the  
25 Secretary of the Interior, who was like my ultimate

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1                                   P-R-O-C-E-E-D-I-N-G-S  
2                  HELEN CLOUGH: Welcome. We're going to go  
3 ahead and start. My name is Helen Clough, and I am the  
4 head of planning for Fish and Wildlife Service in  
5 Anchorage. And this evening we're here to talk about  
6 the environmental impact statement that we're doing for  
7 the proposed land exchange and road linking King Cove  
8 and Cold Bay.  
9                  And I'll start off this evening with a little  
10 presentation just to explain some of the environmental  
11 impact statement. We have the telephone. On the phone,  
12 we have Stephanie Brady, who is the project leader. You  
13 may remember Stephanie came out here last -- about two  
14 years ago when we did the scoping meeting. And,  
15 unfortunately, she couldn't be here, but she's on the  
16 phone. And then we have some of our other cooperating  
17 agencies listening in, probably some of the State  
18 representatives and perhaps some of the other  
19 contractors.  
20                  This is Joan Kluwe, who is the project lead  
21 from our contractor at URS.  
22                  JOAN KLUWE: I'm going to adjust the focus a  
23 little bit.  
24                  HELEN CLOUGH: Thank you.  
25                  And we have Valerie Martinez from Midnight Sun

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1 boss, other than the President, to prepare an  
2 environmental impact statement, and that's what Fish and  
3 Wildlife Service is doing. And then the Secretary will  
4 decide if having the road -- the land exchange and the  
5 road is in the public interest. So he is the final  
6 decision-maker.  
7                  The proposed action of course is having a  
8 road. And the law sets out a lot of standards for the  
9 road, and one of them is that it will be primarily for  
10 health and safety. It's not to be used for commercial  
11 purposes, other than transportation of people. So  
12 people can go back and forth, including like people to  
13 Peter Pan or wherever, but it wouldn't be allowed to  
14 haul freight and things over the road.  
15                  The land exchange itself, we're looking at --  
16 and I don't know if you can all see this map. There's  
17 copies of it in the book. But it would involve  
18 exchanging -- there's two different routes, but a little  
19 over 200 acres of refuge land to the State of Alaska,  
20 the corridor in which a road could be built. That would  
21 go to the State of Alaska, along with about 1600 acres  
22 on Sitkinak Island, would be given to the State in  
23 exchange for over almost -- what is it? -- 43,000 acres  
24 of State land up here on the north end of Izembek Refuge  
25 and Alaska Peninsula Refuge. And those lands would come

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1 to the refuge as wilderness.  
2 King Cove Corporation would give up to the  
3 refuge about 13,000 -- over 13,000 acres of the lands  
4 around here, up around Kinzarof Lagoon, Mortensens  
5 Lagoon. And those would come into the refuge in  
6 exchange for nothing other than the road. The  
7 corporation would also give up over 5,000 acres of a  
8 selection they have within the refuge. They would be  
9 able to make that selection elsewhere, so they would be  
10 able to obtain 5,000 acres, but it would not be in the  
11 refuge. The Mortensens -- some of the lands coming in  
12 would also become wilderness if they're adjacent to  
13 wilderness.  
14 Other things required by the law include  
15 having a cable barrier or something alongside the road  
16 to keep vehicles on the road. And I would encourage  
17 those of you that submit written comments or if you have  
18 any good ideas, we have issues, I'll be honest, with  
19 this idea of a cable barrier or a chain barrier along  
20 the road in terms of safety, in terms of costly  
21 maintenance, and in terms of it could have impacts that  
22 are critical to wildlife. And the law says we're  
23 supposed to do something. So if you've got other ideas  
24 of how we can try and keep vehicles on the road, we're  
25 all ears.

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1 Of course we're supposed to minimize the  
2 impacts of the road corridor on the refuge and its  
3 resources. We're supposed to develop what they call a  
4 mitigation plan, which would be things that we can do to  
5 avoid impacts or to compensate for impacts like wetlands  
6 that cannot be avoided, things like that. And then of  
7 course we're supposed to transfer from the refuge the  
8 minimum acreage necessary for the road and to use  
9 existing roads to the maximum extent that we can.  
10 The last thing on there was part of a federal  
11 law required the State to, if the land exchange goes  
12 through, make Kinzarof Lagoon, the State lands in there,  
13 part of the State refuge system. And also, because  
14 clearly, you know, there's about 50,000 acres of land  
15 coming in in exchange for 206, 210 acres, depending on  
16 which alternative, going out, this is not an equal value  
17 exchange, so the Alaska State legislature also had to  
18 pass a law to authorize that unequal land exchange,  
19 which they did in 2010. So the State has filled that  
20 part of their obligations to make this thing happen.  
21 Just really quick, Izembek Refuge was  
22 established as the Izembek Game Range in 1960. In 1980,  
23 it became the refuge. And then all this kind of darker,  
24 brighter green, was designated wilderness by Congress in  
25 1980.

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1 Izembek Refuge, of course all the national  
2 wildlife refuges, are about wildlife. And you know  
3 better than me living here, you know, what some of the  
4 resources are. Obviously resources are a concern to us  
5 in this environmental impact statement, which we looked  
6 at, especially caribou, bears, and many species of  
7 birds; brant, Emperor geese, to name a few.  
8 Over on the right-hand side of the slide, it  
9 indicates that Izembek Refuge is a National Wildlife  
10 Refuge, but it's also been recognized as a Globally  
11 Important Bird Area, a Wetland of International  
12 Importance. These are designations that recognize the  
13 international value in terms of the birds that come  
14 through here that don't just live in the United States.  
15 Of course you are familiar with your long  
16 history of the Aleut people in this area, the impacts  
17 and changes the Russians and others brought to your  
18 lives, and you persist here today. Obviously the  
19 airport in Cold Bay is there because of World War II.  
20 And the remains of many of the facilities still dot the  
21 landscape, including many of the old roads and trails on  
22 the refuge.  
23 Again, I don't have to tell anybody in this  
24 room, obviously you've seen that helicopter, or one like  
25 it here, many times. You've probably had some, you

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1 know, scary experiences with -- if not you personally,  
2 but certainly with your loved ones and friends being  
3 evacuated. And that's obviously the reason we're  
4 looking at the road.  
5 In terms of our environmental impact  
6 statement, it's divided into chapters. And if you have  
7 opened the compact disc, you know, it's a little piece  
8 of plastic, and if you print that out, it's 1100 pages,  
9 this big, giant document. I think Della has got a  
10 couple of copies of it if somebody actually wanted to  
11 look at the whole thing, but it has different chapters.  
12 And the purpose and need chapter, the first  
13 chapter, that just explains why we're doing it. And,  
14 again, from the King Cove perspective, we're looking at  
15 health and safety access to get out of here for routine  
16 medical care as well as emergencies. And then quality  
17 of life, being able to leave town when you want to. And  
18 having a transportation system, at least as far as the  
19 Cold Bay Airport, getting there is more affordable.  
20 When we came around and did scoping meetings,  
21 we identified a number of issues, things that people  
22 were concerned about, and many of these were addressed  
23 in the environmental impact statement. You know,  
24 impacts from a road could affect soil, wetlands,  
25 threatened and endangered species, other wildlife. Some

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1 of the social concerns, the benefits of having a road in  
2 terms of human health and safety; the economics of  
3 trying to operate a hovercraft or something else.  
4 And that last one, effects to wilderness  
5 because one of the big issues that has been raised, what  
6 we hear a lot about, especially from some of the  
7 national interest groups, are effects to wilderness  
8 because a road is not a typical thing in wilderness.  
9 And of course if the land exchange goes through, the  
10 lands outside, you know, this road corridor, whichever  
11 one -- if the land exchange goes through, would not be  
12 wilderness. Wilderness has to be separate land that  
13 would become State land. But taking land out of  
14 wilderness, while not unprecedented, is not common.  
15 There are five alternatives in the draft  
16 document. We've got some of the maps up there. Again,  
17 you have the summaries. There's lots of maps.  
18 The no-action alternative is continuing the  
19 current situation. And at the time we started preparing  
20 the environmental impact statement, the borough believed  
21 that they were going to begin operating the hovercraft  
22 three days a week seasonally as they had been. And  
23 about six week before we thought the document was going  
24 to be released, which actually there was somewhat of a  
25 delay, the borough notified us that as they looked into

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1 it in more detail, they weren't going to operate the  
2 hovercraft here again. And so the actual printed  
3 no-action alternative still has the hovercraft, but we  
4 recognize that when we take this from a draft  
5 environmental impact statement to a final, we will no  
6 longer have the hovercraft.  
7 And the borough has notified us that their  
8 interim plan, or current plan, if the land exchange is  
9 not approved by the Secretary of the Interior would be  
10 to have some kind of ferry with -- you know, a  
11 drop-front-type ferry that could use the existing  
12 hovercraft facilities.  
13 We're looking at two different road  
14 alternatives, a southern alignment, which is alternative  
15 two, and a more central alignment. And I'll explain  
16 those in a minute and kind of compare them. And then  
17 the last two alternatives we're considering are having  
18 the hovercraft operate six days a week -- we recognize  
19 it won't be here, but that was actually a selected  
20 alternative. If you remember the EIS that the Corps of  
21 Engineers did that led to the acquisition of the  
22 hovercraft, that was the plan back then. And then the  
23 last alternative will look at some kind of a ferry,  
24 similar to the alternative that was in the 2003 EIS.  
25 I'm just going to skip through some of this in

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1 the interest of time.  
2 Okay. The main difference between these  
3 two -- the two road alternatives, the northern one is  
4 about two miles longer, costs a couple million dollars  
5 more to construct it. It avoids a little less wetlands.  
6 And because of the terrain, the actual footprint of the  
7 road, the disturbance of the road, is also a little bit  
8 smaller, but they're relatively similar.  
9 The southern one is all within the Kinzarof  
10 Lagoon drainage. The northern one is in some of the  
11 Izembek Lagoon. It hits both drainages. And as you can  
12 see from the -- a good portion of it is the same because  
13 there's really only one reasonable way to get across  
14 here. And as you get further over here, you're picking  
15 up the old roads. And we tried to put it, to the extent  
16 that we could, on existing roads.  
17 The hovercraft alternative -- the ferry  
18 alternative is very expensive.  
19 One of the things that the law requires is  
20 that we identify these mitigation measures, these things  
21 that we would require somebody to do, depending on who  
22 it is, us, the State. And some of them were even  
23 spelled out, things we should consider in the law. You  
24 know, during construction, to worry about sediment  
25 obviously; trying to protect the fish and wildlife; a

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1 concern that evasive species, you know, undesirable  
2 plants or perhaps animals -- more likely plants in this  
3 area -- could get in; wetlands, obviously, always a  
4 concern; cultural resources. So those are some of the  
5 things that we would be looking at.  
6 The summary document has several -- a big,  
7 long table at the end. And that really highlights some  
8 of the impacts, and I'm going to skip over those. But  
9 generally, depending on the alternative, those with  
10 roads, you know, our analysis shows we have concerns  
11 about impacts to caribou, but we recognize that  
12 caribou deal with roads -- individual caribou deal  
13 differently with roads. Some caribou avoid them; others  
14 are quite comfortable around them and cross them  
15 regularly. And I know I've certainly seen caribou  
16 hanging out for days right -- in my very brief time out  
17 here -- by the Cold Bay Airport.  
18 But we definitely have some concerns in our --  
19 our analysis that's in the draft EIS has shown concerns  
20 about impacts to swans, impacts to brant. We know the  
21 borough and the city have -- and the corporation have  
22 biologists looking at our data and they're questioning  
23 it, so we know that's one comment that we'll be, you  
24 know, analyzing in a lot of detail.  
25 The positive impacts of some of the

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1 alternatives, of course would be the road alternative;  
2 beneficial impacts to the community to health and safety  
3 and to access; less cost to both the borough government  
4 and the communities.  
5       The ferry alternatives and the hovercraft  
6 alternatives are -- you know, would be similar to the  
7 situation, except a lot more costly because they'd be  
8 more costly operations.  
9       So where do we end up? So where are we right  
10 now? We're holding public meetings. We actually had a  
11 meeting in Anchorage and Sand Point and Cold Bay. And  
12 then last night, courtesy of the corporation, we had a  
13 meeting via phone with the people in False Pass and  
14 Nelson Lagoon because the weather didn't allow us to get  
15 there yesterday. And Della and Gary prevailed on us to  
16 come over here yesterday so we could be sure to be here  
17 today, and so we had people participate via phone. And  
18 of course we're here. This is our last public meeting.  
19       The comment period ends next Friday, the 18th.  
20 And for those of you that want to submit written  
21 comments, if you're mailing them, that means postmark.  
22 We recognize that we'll get the comments whenever the  
23 post office gets them to us. So you don't have to like  
24 send them express mail or anything like that. But you  
25 can e-mail us, you can fax us, so you don't have -- you

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1 know, you don't have to rely on the mail if you don't  
2 want to. Stephanie gets the written comments.  
3       And what do we do next? As we get all these  
4 comments in, URS Corporation will be preparing an  
5 analysis tabulating all those comments that are  
6 opinions, you know, I like alternative two or I like  
7 alternative five, so that we know who's saying that.  
8 But then also -- and we acknowledge those comments and  
9 provide them to the decision-maker, but the comments we  
10 really have to work on are those where somebody -- what  
11 they call substantive, where somebody tells us, hey,  
12 your analysis on the impacts on Emperor geese was wrong  
13 or your estimates -- and we heard it in Cold Bay -- your  
14 estimates for road maintenance are wrong. Please  
15 explain those.  
16       And those kind of comments, we have to go back  
17 and say, well, gee, you're right, our estimate is wrong,  
18 or, yeah, we agree with yours, but we have to prepare a  
19 response. And so those responses to those kind of  
20 comments will appear in the draft -- the final  
21 environmental impact statement, along with any changes  
22 we make based on all the comments we hear.  
23       So this summer we'll be working on that with  
24 our cooperating agencies, preparing the final EIS. I  
25 anticipate that that will come out probably in late

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1 October. And that will have to -- by regulation, have  
2 to have a preferred alternative. So Fish and Wildlife  
3 Service, Jeff Haskett, the regional director, is the  
4 decision-maker on the EIS, which our EIS is really a  
5 recommendation to the Secretary of the Interior because  
6 he decides about the land exchange.  
7       And so we anticipate that -- we have to wait  
8 at least 30 days after we issue the final environmental  
9 impact statement. His decision will happen probably  
10 right around Christmas and, we assume, following shortly  
11 thereafter. Quite frankly, this public interest  
12 determination the Secretary has to make is not some  
13 established process, so he could do it in the same day  
14 or he could do it weeks later. I don't know. But I  
15 believe that he will make a decision shortly after.  
16       And he will consider whatever the Fish and  
17 Wildlife Service recommends, but he'll also consider  
18 what he's heard from the people of King Cove and the  
19 corporation and the tribal government and, you know, his  
20 role as trust responsibility, because he's in charge of  
21 national refuges, but he's also over the Bureau of  
22 Indian Affairs and has this special trust relationship  
23 with Native Americans. So, you know, he will consider a  
24 number of factors beyond just what's in our  
25 environmental impact statement.

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1       So with that, I will end my formal  
2 presentation. And if there are any questions before we  
3 get into hearing from you, I will be happy to answer  
4 questions if I can or if Joan can. If I think your  
5 question is more of a comment, I will ask you to come on  
6 up and talk into the phone and make sure we get it  
7 recorded as a comment.  
8       When you're commenting, if you would please  
9 state your name so that Valerie can get that for the  
10 record. And if you didn't sign in, we'd really  
11 appreciate if you would. It helps us know who was here  
12 just to document the turnout. Because I would say --  
13 Joan, you were in Anchorage. We have almost as many  
14 people here as we did in Anchorage?  
15       **JOAN KLUWE:** Just about the same.  
16       **HELEN CLOUGH:** And, you know, the difference  
17 in size of the communities, so -- and I really  
18 appreciate you coming out. It's such a lovely spring  
19 day.  
20       So are there any questions before we move into  
21 hearing from you?  
22       **DELLA TRUMBLE:** Stephanie, how many comments  
23 did you say you probably received so far to date?  
24       **JOAN KLUWE:** There's been 1500 comments  
25 approximately received to date. And about 1300 of them

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1 have been form letters and about 200 of them are  
2 original, unique responses.  
3 **HELEN CLOUGH:** And normally people comment at  
4 the very end of the comment period, so we anticipate  
5 getting most of the comments next week. We got about  
6 40,000, as I recall, comments during the scoping. So,  
7 you know, it's anybody's guess. We don't know until  
8 they come in how many we'll get.  
9 **DELLA TRUMBLE:** And of the 40,000, how many of  
10 them were technically form letters?  
11 **HELEN CLOUGH:** Joan, do you remember that off  
12 the top of your head?  
13 **JOAN KLUWE:** I don't remember, but it is in  
14 the scoping report, which I think is Appendix C of the  
15 EIS.  
16 **HELEN CLOUGH:** And we can look -- I can look  
17 it up and tell you tomorrow, Della.  
18 **DELLA TRUMBLE:** I'll find it.  
19 **HELEN CLOUGH:** Yeah. A large -- most of them.  
20 I can tell you that.  
21 **JOAN KLUWE:** Yeah. A large portion.  
22 **HELEN CLOUGH:** So, I mean, it's the individual  
23 comments that we spend a lot -- you know, a lot more  
24 time because it -- whether it's ten people or 500 people  
25 tell you exactly the same thing, you only have to read

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1 it once and we note how many people said it.  
2 Again, it's not a voting process because  
3 people that feel passionately -- in your case, I know,  
4 because I've been here before that most, if not all of  
5 you, are very much for this road -- come out. And then  
6 people that are really opposed to something tend to  
7 comment. Other people -- people that don't care or  
8 people that -- you know, like people that live in  
9 Anchorage or Juneau or Washington, D.C., that might be  
10 in favor of the road, they're probably not going to  
11 bother to write a letter. So we know we usually hear  
12 more from the opponents of something that people don't  
13 like what we're doing. So we take that into account  
14 when we consider the public comments.  
15 Other questions?  
16 **UNIDENTIFIED SPEAKER:** You mentioned the cable  
17 rail and then also you mentioned the commercial driving  
18 or not. Were those rules or was that set up when the  
19 bill was passed or does that come out of the EIS?  
20 **HELEN CLOUGH:** No. That's in the bill. What  
21 the bill says, is a cable system -- cable barrier. And  
22 what we're looking at is something with posts and a  
23 chain right now. And, quite frankly, we're not that  
24 happy with it. So if people have better ideas -- but  
25 that was required in the law. And the fact that the

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1 road is only for noncommercial use, except for shared  
2 rides and taxis, that's right out of the law. We didn't  
3 come up with that.  
4 **UNIDENTIFIED SPEAKER:** That includes mail?  
5 **HELEN CLOUGH:** That is a good question. I  
6 would assume so, but I really don't know because that's  
7 kind of a government thing. I honestly do not -- can't  
8 answer that question.  
9 Joan?  
10 **JOAN KLUWE:** One clarifying point on the  
11 barrier. There's two methods that are being analyzed in  
12 the EIS right now. One is, as Helen mentioned, bollards  
13 with a chain between. And the other one is just  
14 bollards only with closer spacing so that animals could  
15 still pass through.  
16 **HELEN CLOUGH:** Yeah, posts.  
17 I'd have to ask our attorneys and they  
18 probably would really have to think about it. I can't  
19 give you a . . .  
20 **UNIDENTIFIED SPEAKER:** Commercial would mean  
21 not freight and stuff.  
22 **HELEN CLOUGH:** Yeah.  
23 **UNIDENTIFIED SPEAKER:** I don't think mail is  
24 included in the freight, but I'd like to find that out.  
25 **HELEN CLOUGH:** We will see. And the other

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1 thing, if the road is approved, there's going to be  
2 several steps in actually finalizing all the land  
3 exchange agreements with the State and the corporation  
4 and what exactly -- you know, the deeds for the land  
5 going to the State, any restrictions that would be in  
6 the deeds related to the road.  
7 Other questions? I'd really like to hear from  
8 you all.  
9 Okay. I will --  
10 **STANLEY MACK:** I have one question, and that  
11 is with regard to the comments that you made during your  
12 opening statement and that's with regard to the report  
13 that Jeff Haskett is going to be making. You said that  
14 you would make your recommendation or the department  
15 would make their recommendation to the Secretary. And  
16 my question is, is how in depth does your -- U.S. Fish  
17 and Wildlife have in regard to examining the comments  
18 that are being placed?  
19 Do they -- is the process going to be  
20 something like someone saying, you will examine the  
21 comments and then weed them out and then make a  
22 recommendation to the Secretary? Or does the Secretary  
23 have his staff review those comments also?  
24 **HELEN CLOUGH:** Well, in terms of the comments,  
25 we will make a summary of all the comments, trying to

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1 characterize the very best -- and that's why we're  
2 having URS do it, so it's not Fish and Wildlife  
3 Service -- trying to do the very best job we can of  
4 summarizing. And plus, we can go directly back to every  
5 e-mail, letter, or whatever and look at that. And  
6 probably -- certainly the actual letters and stuff that  
7 come from you, from Della, from Belkofski Tribe, those  
8 letters themselves, I mean, I'll make sure that Jeff  
9 Haskett actually reads those letters.

10 You know, the State -- key interest groups --  
11 I mean, that's -- we do that in all processes. But all  
12 those we summarize, there will be a sample probably in  
13 the appendix to the final environmental impact  
14 statement. It will have the whole summary and then it  
15 will have selected examples of like -- an example of a  
16 form letter, but it will have -- you know, probably be  
17 some number of the key comment letters in there so that  
18 the public can see them as well as people can go come  
19 and see them from us.

20 The final environmental impact statement, its  
21 record of decision, that whole big -- you know, it's  
22 1100 pages. That will be our official recommendation to  
23 the Secretary, so backed up by all the analysis we've  
24 done and, you know, Jeff Haskett will decide what the  
25 preferred alternative is. He'll decide what his

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1 decision is, and his decision is just on the  
2 environmental impact statement. So it's, Mr. Secretary,  
3 Fish and Wildlife Service recommends you do -- pick  
4 alternative two or pick alternative five, whatever it  
5 is. And then that will be his recommendation to the  
6 Secretary.

7 So unlike -- normally when we do an  
8 environmental impact statement, it's a decision we're  
9 making of something that we can implement, so this is  
10 very unusual for us because our decision is only a  
11 recommendation. It's not -- we don't --

12 **STANLEY MACK:** But the question is, we can  
13 make all these statements and it's still up to  
14 Mr. Haskett to send in his evaluation or his  
15 recommendation based on his analysis of the statement?

16 **HELEN CLOUGH:** Well, what he thinks is best  
17 from his role as the head of Fish and Wildlife Service.  
18 I can guarantee you, knowing Jeff Haskett, that he will  
19 certainly share with Mr. Salazar, presuming he's still  
20 the Secretary, that this is what I heard from the local  
21 people, this is what they want. We're not going to  
22 pretend -- and I can't tell you what he's going to  
23 decide. I have no idea.

24 But, I mean, if he were to recommend something  
25 that's not what you want, he will certainly share the

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1 other side as well, knowing that you all will take that  
2 opportunity as well.

3 **STANLEY MACK:** I'm going back to what took  
4 place here about three months ago, I think it was, where  
5 he was going to make a recommendation and we took some  
6 action and had that deferred, and so that led me to ask  
7 the question as to what impact does his recommendation  
8 have on the decision that the Secretary will make.

9 **HELEN CLOUGH:** I honestly have no idea. I  
10 mean, I know the Secretary will consider it, but -- I  
11 actually had the great privilege recently to sit in his  
12 office and -- on another matter. Not this topic. And  
13 he went around the table -- there were about 12 of us  
14 sitting at the table. And he didn't -- you know, I'm  
15 pretty low down in the organization with the Secretary  
16 of the Interior up there. And he went around and asked  
17 every one of us what we thought about this particular  
18 issue, and he really listened.

19 And, you know, I mean, I think he will -- I'm  
20 confident that Mr. Salazar, and I'm sure whoever else  
21 gets that job, will be very fair and listen to all  
22 points of view, because he did on another issue. And  
23 I'll be honest, I was pretty impressed.

24 And that's all I can say because I really  
25 don't know how he's going to decide or what he's -- but,

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1 I mean, I know he will listen to you all, I know he will  
2 listen to what, you know, the director of the Bureau of  
3 Indian Affairs has to say, you know, other advisers.  
4 He's got some keen staff that have been around. I know  
5 it will be a deliberative process. He'll definitely  
6 consider what he hears from here.

7 **DELLA TRUMBLE:** Just based on your discussion  
8 with Stanley and then using the example of possibly --  
9 if Haskett picks alternative five -- and this is where I  
10 have a problem with this is because this land exchange  
11 is supposed to be in the best of the public interest, an  
12 exchange for a road. And I realize why we have the  
13 other alternatives in there, but it just doesn't -- you  
14 know, we keep hearing about all these other alternatives  
15 from environmental groups saying, well, the hovercraft  
16 or a different form of ferry or both or something, and  
17 it just -- it's kind of -- kind of misleading in a way  
18 in that whole process.

19 **HELEN CLOUGH:** Thanks, Della. I don't know  
20 what to say other than -- for those who may not know,  
21 one of the reasons we have the hovercraft alternative,  
22 alternative four and five, is because the Corps of  
23 Engineers is one of our cooperators. And they're  
24 hoping, should the road corridor be approved, that they  
25 can use our environmental impact statement for the

1 decision they would have to make for the issue of their  
2 wetlands permit that would be required for road  
3 construction. And they have a very -- they have a very  
4 detailed process they have to go through to make a  
5 decision, as I'm sure many of you are aware from the  
6 last time it happened.  
7 So are there other people -- any other  
8 questions?  
9 **UNIDENTIFIED SPEAKER:** I've got a question for  
10 you. You kind of know how all of us here feel. What  
11 about yourself or people that work for you? How do you  
12 guys feel about this here?  
13 **HELEN CLOUGH:** Number one, I can't say how I  
14 feel because I have to try and -- and I try very hard to  
15 remain impartial because that's my job. And my main job  
16 is to make sure that you are fairly listened to and that  
17 the environmental impact statement -- because one of the  
18 things the law also talks about is, where this process  
19 goes to court. And so I need to make sure it's legally  
20 defensible and is fair and is non-biased. So I have to  
21 keep myself out of it and keep my opinions to myself.  
22 I would love to answer that question, but I  
23 can't. It would be really unfair.  
24 **UNIDENTIFIED SPEAKER:** Is there very many  
25 people pulling for us?

1 **DELLA TRUMBLE:** That's the real question.  
2 **HELEN CLOUGH:** Well, I mean, we had people --  
3 you know, we couldn't get there and we had to cancel at  
4 the last minute -- you know, you had people -- yeah,  
5 False Pass and Nelson Lagoon are very small towns. They  
6 were there pulling for you. The majority of the people  
7 in Cold Bay were definitely pulling for you. And at  
8 least half the people that came out in Anchorage were  
9 definitely pulling for you. I mean, so, yeah, you  
10 definitely have people that are.  
11 **UNIDENTIFIED SPEAKER:** And any chance of the  
12 Secretary coming out here?  
13 **HELEN CLOUGH:** That, I don't know.  
14 **UNIDENTIFIED SPEAKER:** PenAir would probably  
15 like to give them a ride and I sure would like to give  
16 him a boat ride.  
17 **HELEN CLOUGH:** I imagine he would like to get  
18 out here, but you can imagine how many directions he is.  
19 We do believe that Dan Ashe, who's the director of Fish  
20 and Wildlife Service -- in fact, the last time I was in  
21 King Cove it was because I got his seat on the plane  
22 because he said he couldn't come and then at the last  
23 minute he wanted to come, but a whole bunch of other  
24 people had gotten on standby. He definitely plans to  
25 come out this summer. I'm not sure -- I've heard two

1 different dates.  
2 Do you have a date?  
3 **DELLA TRUMBLE:** I heard the end of May and  
4 then the latest I heard was August.  
5 **HELEN CLOUGH:** Okay. That's kind of what I've  
6 been hearing, too. And I've been out of the office for  
7 like three weeks, so I'm not necessarily in the know.  
8 But he definitely wants to come out.  
9 We never know what the Secretary is doing, and  
10 his plans change like that. So I wouldn't say it's  
11 highly likely, but it's possible. And if he did get to  
12 Alaska this summer, I would say this would be high on  
13 his list of places to go. But I don't control his  
14 schedule.  
15 **UNIDENTIFIED SPEAKER:** You're saying that it  
16 has to include the boat or the ferry, the hovercraft or  
17 the ferry, and it just includes the roads?  
18 **HELEN CLOUGH:** We -- based on working with all  
19 the cooperators together, especially the Corps of  
20 Engineers, we decided to include all those alternatives.  
21 Quite frankly, the only alternative that, you know, Fish  
22 and Wildlife could have any role in implementing are the  
23 road alternatives or the no action. You know, we can't  
24 do a ferry. So I probably -- I don't know what Jeff is  
25 going to pick, and I'll leave it at that.

1 **WARREN WILSON:** I have a question. On your  
2 draft EIS page here, you say that the estimated cost for  
3 operation and maintenance is a million dollars and 26.3  
4 million for life cycle. I'm just wondering, where did  
5 that number come from for a little 20-mile road? Is  
6 that just to scare the government off? We ain't  
7 building that. It would cost too much to maintain. I  
8 can't see it costing that much.  
9 **HELEN CLOUGH:** No. The maintenance -- I think  
10 that is the --  
11 **WARREN WILSON:** Operation and maintenance.  
12 **HELEN CLOUGH:** Operation and maintenance was  
13 about \$150,000 a year. The million dollars a year was  
14 for the operation and maintenance of the hovercraft, as  
15 it was operating. The two road alternatives --  
16 **WARREN WILSON:** It says the hovercraft -- oh,  
17 okay.  
18 **HELEN CLOUGH:** Yeah, that's probably  
19 alternative one. I think if you look at -- pardon me  
20 while I skip to the other alternatives. But the road  
21 maintenance --  
22 **WARREN WILSON:** Oh, okay. I misplaced it.  
23 Well, that was the question any way.  
24 **HELEN CLOUGH:** Yeah. No, the road costs are  
25 about \$21 and \$23 million, depending on which one it is,

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1 and like \$150,000, \$160,000 approximately, and that's  
2 our estimate. And that would be for the new road. That  
3 doesn't include other --  
4 **WARREN WILSON:** One more comment here.  
5 **HELEN CLOUGH:** Sure.  
6 **WARREN WILSON:** You were talking about -- I  
7 noticed there was a lot of ferry talk here. We took a  
8 drive out and looked around out there this winter. That  
9 Cold Bay was blocked off with ice for at least three  
10 weeks this year or more, so I can't even -- couldn't  
11 even get a crab boat in there or a freight boat, for  
12 that matter. And it was blocked off to the end of Kelp  
13 Point over to Delta Point. And that -- you know, that  
14 is thick ice.  
15 **HELEN CLOUGH:** Yep.  
16 **WARREN WILSON:** It never lets up. You know,  
17 it finally went out here just a few weeks ago, just like  
18 all over the state. It's kind of an unusual winter, but  
19 that's what kind of weather we have up here. You know,  
20 you can keep a road open, but you're not going to get an  
21 icebreaker just at Cold Bay to get here, people across  
22 the bay. That's impractical. So just a comment.  
23 **HELEN CLOUGH:** Thank you.  
24 Yeah, I'm going to go ahead and move into any  
25 comments. And I would ask though -- Stephanie Brady,

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1 who really wishes she could be here, I know she's on the  
2 phone, and I imagine the State folks are there. And so  
3 they can hear and it will make it a little easier for  
4 our court reporter, so if people would come up. And you  
5 can just stand or take a chair.  
6 So I will move into comments, and we will  
7 record your comments at this time.  
8 **WARREN WILSON:** I want to make a few more --  
9 **HELEN CLOUGH:** Yes.  
10 **WARREN WILSON:** -- so I'll state my name and  
11 everything.  
12 **HELEN CLOUGH:** So I'll ask people to be brief,  
13 but I'm not -- you know, unless somebody goes on for a  
14 long time, I'm not going to -- you know, we're not going  
15 to time anyone or anything, because I know how important  
16 this is, but I would ask you to be brief and succinct.  
17 And so I will open up to comments.  
18 Gary, you looked like you were ready to start.  
19 **GARY HENNIGH:** I am. Okay. My name is Gary  
20 Hennigh, H-e-n-n-i-g-h, for the record. I know most of  
21 you; you know most of me.  
22 First of all, we don't need to worry a whole  
23 lot about alternative four and alternative five. That's  
24 just part of the process. The government has already  
25 insulted us pretty bad -- and I'll talk about that in a

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1 second -- but there's no way that they're going to  
2 select a hovercraft, which we know isn't going to work,  
3 or a marine ferry terminal. So it's part of the  
4 process, Helen has got to explain it, but it can't  
5 happen because it would be the ultimate insult.  
6 But the bottom line is, the government has not  
7 done us a favor. The draft EIS that we're responding to  
8 is not fair to the people of King Cove. It protects the  
9 things that they want to protect, the tundra swans, the  
10 black brant, the Steller's eider, the bear, caribou.  
11 We, on behalf of the city, the tribes, the corporation,  
12 and the borough, have spent a lot of money and have over  
13 100 pages of comments going back to the government  
14 saying, here are our mistakes, here are things that we  
15 do not believe in, you can't do this to us. It's about  
16 you, the people of King Cove.  
17 If I have to hear one more time about four  
18 tundra swans might be moved out of a nest because  
19 there's going to be a road within 1500 meters of that  
20 nest, that's not fair to the people of King Cove.  
21 Jeff Haskett is a nice guy. Helen is a nice  
22 lady. They will not be probably our friends on this  
23 issue, even though I can't speak for Helen. I respect  
24 her. Jeff has not done us a favor, and he won't. Our  
25 friends are going to be Senator Murkowski, Senator

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1 Begich, Senator Inouye, Senator Akaka, and Governor  
2 Parnell.  
3 We've all known this is coming down to the  
4 politics of being fair to the Aleuts of King Cove at the  
5 expense of sharing the Izembek Refuge with us so those  
6 15 to 20 cars a day getting you folks and myself, when  
7 I'm here, primarily to the Cold Bay Airport for your  
8 medical, your health reasons, your quality of life.  
9 It's about you folks, the people of King Cove. Don't  
10 lose sight of that. We're not losing sight of that.  
11 We're working hard to make sure that that is understood.  
12 We are also offering the federal government  
13 tonight -- we will pay for a survey that they should  
14 have done to ask the people of King Cove how many times  
15 can you not get to the Cold Bay Airport, particularly  
16 when you have a medical or a health emergency, how much  
17 grief has your family over the decades had because of  
18 not being able to have access to the Cold Bay Airport.  
19 We feel that the data that's needed in the draft EIS  
20 that's not there needs to be there to better tell our  
21 story.  
22 Our job right now is to help the government  
23 have the best possible final EIS so that they can make  
24 the best possible decision on our behalf, but we need to  
25 be very cautious that their values, because of the

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1 Izembek Refuge, are not putting the people of King Cove  
2 first, our opinions.  
3       So, anyhow, I just wanted to set the stage to  
4 let you know that for the last month, about ten of us  
5 have been working around the clock to set the record  
6 straight, to provide the information that we need to  
7 have, to give the residents of King Cove a fair chance  
8 of having this land exchange approved.  
9       And the rest of you, please don't be bashful  
10 tonight. Speak to the issue. Speak to why it's so  
11 important. We need to have you on record. And please  
12 do sign in tonight. And, particular, sign the petition  
13 that we're sending to Secretary Salazar to speak to why  
14 this is so important. Thank you.  
15       **HELEN CLOUGH:** Thank you, Gary.  
16       **DELLA TRUMBLE:** Me again. Gary and I have  
17 been doing this so long we can do this in our sleep.  
18       My name is Della Trumble and I represent the  
19 Agdaagux Tribe of King Cove and the King Cove  
20 Corporation. What I want to talk a little bit is this  
21 word "value." It's been coming up a number of times  
22 over the course of the last few days in the course of  
23 the public hearings.  
24       And I think I'd like to talk about that,  
25 number one, this EIS, first of all, needs to include a

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1 number of the letters that were initially sent, and  
2 through the course of these hearings, that fairly and  
3 honestly and openly portrays how much people in this  
4 community have gone through or lost over the period of  
5 decades, and it continues today. And the EIS needs to  
6 portray that so people picking it up are the people that  
7 are making decisions, fully understand why we have  
8 fought so hard and spent so much money to date for this  
9 road.  
10       The value of the lands that both the King Cove  
11 Corporation and the State are putting up to add to the  
12 exchange. You know, King Cove had an appraisal done,  
13 King Cove Corporation, on the Mortensens piece about --  
14 what? -- seven years ago, eight years ago -- seven years  
15 ago and that value of that 11,000 acres was well over  
16 \$1 million. That technically is not in here, and that  
17 today would be more than that.  
18       Without talking about the value of lands that  
19 were given up for subsistence, or our own use, and  
20 having a federal umbrella put over that; the value of  
21 the lives saved and the value of the peace of mind that  
22 people can travel to and from King Cove and Cold Bay  
23 without having to feel threatened or afraid; the value  
24 of these communities, the agencies, and the governments  
25 that can work together more closely instead of

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1 constantly bickering and not agreeing -- I think we have  
2 a lot to offer each other -- the value of the funding  
3 saved and people can get out on a regular flight and not  
4 turn into a medevac situation when you look at -- just  
5 the lifeline is \$30,000. When you add in the Coast  
6 Guard helicopter or a C-130 or the fact that a person's  
7 health has been compromised so much that that value,  
8 that dollar goes up, because of an increased amount of  
9 medical, and those are taxpayers' dollars. We kept  
10 hearing in Cold Bay, the concern, the big issue, about  
11 taxpayers, taxpayers have to pay this and taxpayers have  
12 to pay that.  
13       The value of the education that Izembek Refuge  
14 can contribute to the kids in the school year and the  
15 people here with the culture and the fisheries and what  
16 we can offer to educate them; the value of actually  
17 seeing our government making a decision based on good  
18 common sense -- this is something that we've fought  
19 before and that we lost in that process because it was  
20 politics -- and the value of the tax dollars saved by  
21 utilizing the most economical mode of transportation  
22 between these communities; and then considering the  
23 value of the lives that are saved, because you cannot  
24 put a dollar on that, and this basically has gone on way  
25 too long. There's no value that you can balance on a

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1 human life and a bird. There is no dollar amount that's  
2 out there that can ever say what that difference is.  
3 Thank you.  
4       **HELEN CLOUGH:** Thank you, Della.  
5       **WARREN WILSON:** I'll go ahead. Warren Wilson,  
6 for the record, King Cove resident for 50 years. I  
7 currently -- my winter job is to take care of the  
8 airport up here at King Cove. That's kind of why I had  
9 the maintenance questions. I didn't have my glasses to  
10 see the paper.  
11       **HELEN CLOUGH:** That's okay.  
12       **WARREN WILSON:** I couldn't see it.  
13       I just want to make a comment on kind of the  
14 aircraft that are used around here, flying through the  
15 canyon there, to get to Cold Bay, and it's pretty  
16 violent at times. But the aircraft that we're using, I  
17 think the aircraft is darn near as old as me.  
18       And it's used to haul freight, and they're  
19 down to one plane and one pilot in Cold Bay to handle  
20 four villages. That puts a lot of pressure on the  
21 pilots over there. We know that a Cherokee is a --  
22 Cherokee aircraft is a general aviation aircraft only.  
23 That's what they were designed for. They use them for  
24 commercial. So that's all I have to say on that.  
25       And then as far as like the people in the few

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1 other meetings we were talking about, the maintenance  
2 issue of keeping the road clear, with the equipment they  
3 have nowadays, we could keep any road clear.  
4 And then the road that goes through Lenard's  
5 Harbor itself, it's a southern exposure road. So when  
6 the sun does come out, it's going to melt the snow off  
7 the road quicker. It's not hid behind some mountain.  
8 That's a plus there for maintenance.  
9 And getting up along in the Izembek area,  
10 that's just flat land there so there's not hills to  
11 worry about where you're going to run off and kill  
12 somebody, except for along Lenard's Harbor there a  
13 little. There's a couple high hills, but that's where  
14 you be careful.  
15 And then as far as the -- we're talking about  
16 Steller's eiders and the swans. The Steller's eiders in  
17 the King Cove Bay during the winter, we see 150 to 200  
18 of those right over here in the bay, and that's right  
19 next to our village and we're driving by them every day.  
20 And every time I see them, it brings back the thought  
21 of, where are the Steller's eiders going, you know,  
22 they're living right here next to us. We're the Native  
23 people and they're the Native bird. We're living  
24 together.  
25 And then the swans, they all have wings. They

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1 can fly off to another spot to nest. And I can see that  
2 some of them lakes are probably not suitable for a swan  
3 to nest around anyway because of the food source at that  
4 lake. They have to fly out to get their food anyway.  
5 And the geese and the brant, they're just  
6 using this for a little corridor just like we want to  
7 use it for to get from point A to point B. They stop in  
8 once or twice a year for two weeks out of the year.  
9 That's just to feed so they can go on their merry little  
10 way. There is a few hunters around here that are  
11 hunting them, all the time, just to feed their families.  
12 Times are getting tough.  
13 We fly to Cold Bay for \$150 a pop. We can  
14 drive over there probably for maybe \$50. That's  
15 cheaper. That's saving money. And our corporation, the  
16 corporation folks at King Cove, if we got the road, we  
17 could access our land over there at Mortensens and  
18 Thinpoint. We see roads going out to Thinpoint now that  
19 have never been there before that are being used by the  
20 people of Cold Bay. We can't access that, unless we go  
21 over by boat or flight over to Cold Bay.  
22 And that eelgrass, I hear a lot of talk about  
23 eelgrass. I -- the only problem I have with eelgrass is  
24 plugging up my sea suction on my boat because it's  
25 drifting out in the ocean and getting caught up. It's

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1 growing very well. With this winter we had, all the  
2 lagoons froze right down to the muske (ph) that's -- and  
3 when it thaws out, it pulls it all out. We seen that up  
4 here. I drive to the airport every day. No sooner than  
5 the ice went out here two weeks, a week later eelgrass  
6 is up already. It's all green, brand-new, ready to go  
7 for the summer. So there is no trouble with eelgrass  
8 here.  
9 Then there was the talk about dust off the  
10 road going to Cold Bay and blowing in -- blowing off  
11 into the lagoons and the eelgrass won't be able to grow.  
12 We can solve that problem. We can pave that road to  
13 Cold Bay. There will be no dust. But I know that won't  
14 happen.  
15 So Cold Bay is just -- I don't know why we  
16 call it a community. It's not really a community. It's  
17 just a hub for that airport sitting there for the State  
18 of Alaska people to keep that airport open. And I heard  
19 it's only open for one airline, one airline only, China  
20 Airlines. We know that China owns the world now, at  
21 least the United States -- we're in debt so much with  
22 them -- but I don't know if that's going to help us any.  
23 Maybe if we'd go to China Airlines we'd have our road  
24 because maybe they'd want some fish or something. But,  
25 okay, that's all I have to say.

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1 **HELEN CLOUGH:** Thank you.  
2 Don't be bashful.  
3 **CHRIS BABCOCK:** My name is Chris Babcock and  
4 I'm the fire chief and also EMS coordinator for the  
5 city. And I have done -- I have been on a lot of  
6 medevacs, not only -- I've seen a lot of medevacs here.  
7 I've seen boats. I've seen the Coast Guard. And it  
8 seems like when there's an emergency and we need a  
9 medevac right away and we can't get the person out of  
10 the airport because of the weather, we think the Coast  
11 Guard is going to come in. A lot of times lately now  
12 the Coast Guard has been telling us they can't.  
13 There's been time where the Coast Guard won't  
14 even come into the airport. They've asked us to bring  
15 the patient out to the hovercraft pad because the  
16 airport -- the wind conditions through the airport are  
17 so swirly and they won't even come into the airport.  
18 So the road is the only alternative that we  
19 have. A boat leaving the harbor here, everybody that's  
20 gone by boat knows it's at least a two-and-a-half-hour  
21 boat ride to the Cold Bay dock, if you can even get off  
22 of the boat once you get to the Cold Bay dock. And  
23 we've got people that are in baskets that can't walk,  
24 can't move, and we're having to hoist them up the dock  
25 with cranes in high wind conditions and things. So the

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1 road is the only option that I see from a medical side.  
2 Thank you.  
3 **HELEN CLOUGH:** Thank you.  
4 **GARY HENNIGH:** Don't be bashful, please.  
5 **STANLEY MACK:** I'll get started. I'll get  
6 started. My name is Stanley Mack, mayor of the  
7 Aleutians East Borough, born and raised in King Cove,  
8 seen it all.  
9 You've seen the Power presentation, and there  
10 was a lot of information there. When it first started,  
11 there was a debate on the environmental impact  
12 statement. We went through a series of scoping  
13 hearings. And at the very beginning, there was a lot of  
14 speculation on the design of this corridor through the  
15 isthmus. We heard terms like -- from the environmental  
16 community, that it's like cutting a baby in half. And  
17 never once have they realized that just up the hill here  
18 a ways, there are several little babies that never got a  
19 chance in this world.  
20 Working in Cold Bay, watching the activity  
21 there throughout the years, I have seen an amount of  
22 hunters coming in, just planeloads coming into Cold Bay,  
23 and just an incredible amount of activity there, all in  
24 the name of sports, sports hunting.  
25 For the record, the Aleut people are not

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1 sports hunters. They never were sports hunters and they  
2 never will be sports hunters. We've been taught by our  
3 ancestors to take only what you need. And if you did  
4 anything more than what you need, you shared it with the  
5 rest of the families. And we still do that today. I am  
6 so thankful for that, that the younger generations are  
7 going out and helping the elders. I see that time and  
8 time again. And it just -- it's so heartwarming to see  
9 that happening.  
10 The quota that we have before us, alternative  
11 two and three, either one of them would be acceptable.  
12 Alternative two is the most inexpensive road corridor  
13 and it could be maintained at a very moderate cost.  
14 Everyone in the department has failed to look  
15 at the positive impact that this would have, not only  
16 for the people of King Cove, but for people that share  
17 the wilderness or the wildlife refuge in Cold Bay.  
18 For the past five years, I think it has been,  
19 or six years, that I've been the mayor, I have gotten a  
20 call from the U.S. Fish and Wildlife Service saying,  
21 "Could we use your bus?" Every spring that the ferry  
22 system comes into Cold Bay, there are tourists coming in  
23 there and the Fish and Wildlife Service has never had  
24 the vehicles to transport these tourists to go to the  
25 wilderness in the wildlife refuge to look at how

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1 beautiful it really is.  
2 This road, I think it could enhance the  
3 recognition of this area, not only for the beauty of it,  
4 but we could be recognized as someone important. We've  
5 shared that with them. That has never been mentioned in  
6 any of this as to what it could do to show the rest of  
7 the world just what we have out here. People speculate  
8 on it. Not only will it save lives, it will make life  
9 enjoyable for those who visit us.  
10 So I'm saying that there's a positive spin on  
11 this road corridor through the wilderness. One, it  
12 would give us a better way of life, a chance to have  
13 better health, protection. As everyone knows here in  
14 this room, if there's a pregnant woman in here, she has  
15 to leave a month ahead of time just because she can't  
16 guarantee getting to the hospital in time to have the  
17 baby. And some, unfortunately, haven't made it to the  
18 hospital. I've seen it firsthand.  
19 They say the hovercraft was an issue. Well,  
20 that's off the table for sure. And of course the  
21 argument from the environmental community is that, well,  
22 you said it saved lives. Yes, it did. Praise the Lord  
23 that it did save lives.  
24 The one instance that it stretched it beyond  
25 the limits was the night they took a passenger over -- a

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1 patient over, and the hovercraft could not get back  
2 because the conditions were such that it was not able  
3 to. But the captain, the pilot of that craft, took a  
4 chance. He went out on a limb. Had there been an  
5 accident, everything would have went goofy. It would  
6 have been just tragic.  
7 Number one, he went beyond the recommendations  
8 of the craft, but he saved a life. But had there been  
9 another incident that night, that person wouldn't have  
10 made it because there was no way an airplane nor a boat  
11 or any other vehicle could have made it to Cold Bay.  
12 These are some of the things that just  
13 happened in the past few years -- five years, I'd say.  
14 But if you go back 30, 40 years, I've seen it happen  
15 worse than that. I've seen them not make it on boats  
16 that couldn't get to the dock. The Coast Guard was not  
17 an option. The only thing they had in Kodiak was a -- I  
18 think it's called an Albatross. That used to fly out  
19 here. When the conditions were right, we'd call them  
20 in. Sometimes they didn't make it and neither did the  
21 patient.  
22 So this road corridor, number two, alternative  
23 two, is the most inexpensive and the most  
24 environmentally friendly corridor as we can possibly get  
25 there. And I encourage everyone to help support that,

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1 just a small comment that we support alternative two.  
2 Thank you.  
3 **HELEN CLOUGH:** Thank you.  
4 All right. Be brave.  
5 **BRENDA WILSON:** My name is Brenda Wilson. I'm  
6 from King Cove, born and raised in South Point, Alaska.  
7 I've heard many comments and many views on this, and  
8 I've researched it extensively in my time. I'm an  
9 adjunct professor of University of Alaska Anchorage and  
10 University of Alaska Fairbanks.  
11 And I've looked -- tried to find statistics on  
12 how important the people of King Cove think this road to  
13 Cold Bay is, and there is no research out there for  
14 that. And so I think that's where a ball was dropped,  
15 that nobody has done that, that can show what the need  
16 is, how greatly it's needed, what the effects and cause  
17 of death have had on the people who live here and have  
18 to fly on a day-to-day basis.  
19 In the past year, I have missed my flight out  
20 for teaching courses out at the University of Alaska  
21 Anchorage nine times. So I have been late for my  
22 classes that I teach a total of nine times. And when we  
23 look at the amount of money it costs -- the amount of  
24 money it costs the students I teach, it can get quite  
25 expensive.

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1 But I looked back through the historical  
2 records of the Aleut people and how they used to travel  
3 through Morzhovoi, all the way up to Port Heiden, Port  
4 Moller. There used to be up to 15,000 people that lived  
5 in the head of Morzhovoi Bay. We did not damage that  
6 tundra. We did not damage that land. We did not have  
7 contamination of that land until the United States  
8 government came in there and put their military  
9 operations in our hunting and fishing lands, and that is  
10 what is still being cleaned up yet today.  
11 We care for our land. We care for the water  
12 and the sea that our fish and our wildlife goes and eats  
13 and lives off of. And to say that we would contaminate  
14 it or make it worse is going by a lot of people trying  
15 to justify why we should not have this road.  
16 When we talk about eelgrass, on Sand Point  
17 there's a creek that goes up to the water source. And  
18 the eelgrass in that creek is more healthy today than it  
19 was 50 years ago. So to talk about the things that can  
20 affect us and affect our ability to have that road is  
21 not really factual until you talk to the elders, talk to  
22 the people that have lived in that region, not just go  
23 by historical research of someone who has never been to  
24 the region, has never looked at the facilities or looked  
25 at the land that we use extensively.

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1 I really need this road to Cold Bay. I don't  
2 want kids or young people -- especially young women in  
3 this region to go through things that I went through.  
4 I've got two living children, but I lost two  
5 children because I couldn't get out of King Cove. I was  
6 stuck here with my first child that I lost 32 years ago,  
7 and then I had my son. And on his first birthday, it  
8 was a beautiful, blowing hard day that you couldn't get  
9 a boat out, you couldn't get an airplane out, and I lost  
10 my second baby. And I don't think that's right for our  
11 young people to have to go through things that are  
12 hurtful for the rest of your life because we're not  
13 allowed to have a corridor to go through to have safe  
14 travel.  
15 We've got family members who refuse to come  
16 back to this region because they won't fly through out  
17 corridor that we have to come to the King Cove Airport.  
18 So I think this is really important. And if we're not  
19 listening to the people, if we're not remembering our  
20 ancestors -- we walked through those areas for thousands  
21 and hundreds of years. It shouldn't be allowed to tell  
22 us that we can't live in our -- and cross our  
23 traditional lands. They are our traditional lands, even  
24 if they are underneath the United States government at  
25 the moment as a wildlife refuge. Thank you.

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1 **DUSTIN NEWMAN:** My name is Dustin Newman. You  
2 have seen us fight for this road. You've seen the  
3 people's strength in fighting for this road. Again you  
4 hear the people -- again you hear the people of King  
5 Cove give their heartfelt testimony, and this is mine.  
6 We ask for a mere 206 acres of the Izembek National  
7 Wildlife Refuge for in return 56,393 acres.  
8 Izembek has cheated us; the government has  
9 cheated us. In the 14 years I've been alive, I have  
10 learned a great deal about our government, especially  
11 toward the Unangan people. The government stole our  
12 land to protect wildlife when the birds and seals were  
13 already respected. We still hunt the birds for food to  
14 feed our families and the elderly. Many of us want to  
15 have a safer way to travel, and this road is the safest  
16 for medical and financial reasons. The elders' stories  
17 give meaning to the people today on how much the  
18 government lied to the people. The government took the  
19 artifacts of the people who lived on these lands.  
20 Liberty and justice for all. We have all said  
21 this at school, liberty and justice for all. This is  
22 not justice. It is a complete defiance of justice and  
23 liberty. Stealing the land is a defiance of justice.  
24 Burning the hunting cabins is a defiance of justice.  
25 Justice has not been served for people who regularly

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1 hunted on Izembek. Liberty wasn't even shown toward the  
2 people.  
3 I am happy to say I have worked with the  
4 United States Fish and Wildlife Service. They have  
5 taught me a great deal of what they want to protect.  
6 But when it comes to saving a life, this road is the one  
7 thing that would be a lifesaving force that will get the  
8 sick, healthy.  
9 Cold Bay has the one thing King Cove doesn't  
10 have, and that's its airport. I've told this story  
11 already and my grandmother told you about what happened  
12 to her. On February 7th, 2011, my grandma was medevaced  
13 to Cold Bay by United States Coast Guard. From there,  
14 she was put on a plane to Anchorage where she stayed  
15 until October. She almost died. If the road was here,  
16 my nana would have made it safer to Cold Bay instead of  
17 flying in 80-knot winds. I thank those men to this day  
18 for saving my nana.  
19 We all have stories of how life is in King  
20 Cove, how the weather affects the way of life. We have  
21 put all our money into this road for a simple reply of  
22 "build the road." But instead you try to protect land  
23 that doesn't have sentimental value to the government  
24 and United States Fish and Wildlife Service.  
25 We're giving you 56,393 acres of land for a

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1 simple 206 acres. The government is gaining land  
2 instead of losing land. Why is this decision so hard to  
3 decide? The government isn't sacrificing anything  
4 besides losing money on sending you here for the third  
5 time to hear our stories when you're not even paying  
6 attention to what we say. We will always fight for the  
7 road to save another life. We will always be here with  
8 a flame of hope for this road.  
9 **HELEN CLOUGH:** Thank you.  
10 **GARY HENNIGH:** Don't be bashful.  
11 **HELEN CLOUGH:** If a 14-year-old can do it, you  
12 guys can, too.  
13 **UNIDENTIFIED SPEAKER:** It's easier said than  
14 done.  
15 **HELEN CLOUGH:** I can't share my opinion of the  
16 road, but I can share my opinion of the young man that  
17 stood bravely and talked like that. That's terrific.  
18 I'm really proud of him.  
19 **LONNIE BRANDELL:** Hello. Lonnie Brandell.  
20 I've lived here for 42 years. And I have a wife and  
21 I've got six girls, six daughters. Three of them are  
22 here; three are in Wisconsin. And they're actually  
23 coming up this summer, and they want to go to school  
24 here. They've been here before lots of times. And, you  
25 know, I support the road to Cold Bay.

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1 And I actually helped build the road, what  
2 we've got now, with SKW. You know, we came across, you  
3 know, a lot of wildlife. You know, they checked us out.  
4 We didn't bother them. They went on their merry way.  
5 We didn't bother nothing.  
6 And we need that road to -- we need that road  
7 to Cold Bay to save lives. I've been on many trips on  
8 airplanes, many trips on boats. We all know the story  
9 about my dad, Seward Brandell. Took him over, pushed  
10 him up the ladder -- well, I pushed and three other  
11 guys, they pulled him up. They pulled him up the ladder  
12 with a piece of rope. He just got out of surgery. But  
13 we all know that story. It was tough. Nobody should  
14 have to go through something like that to -- you know,  
15 if they want to continue their life. They should be  
16 able to drive over to Cold Bay and get on a plane and  
17 get there.  
18 You know, I have six girls. My oldest is 18;  
19 my youngest is four. You know, I'd want something, if  
20 something that happens to them, that they can get over  
21 there. You know, I don't want to sit here and watch  
22 them when there's nothing to do for them. It's tough.  
23 And, you know, going back to the boat thing.  
24 I've made numerous trips over there. We had a  
25 charter -- a season shut down for Peter Pan and we had

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1 to take ten people over at a time. We made -- we ended  
2 up being there for nine days straight. A lot of them  
3 had never been on a boat before. They were sick. And  
4 they had to be on a plane a half hour later. I  
5 remember, one of the trips, we had ten people on and  
6 five of them were puking. They couldn't go out on deck.  
7 It was too rough. I would give them coffee cups to  
8 throw up in. I mean, those coffee cups only hold so  
9 much. I felt bad for those guys. You know, they had  
10 never been on a boat before. We're lucky none of them  
11 died.  
12 And then getting them off the boat to the  
13 dock, I had to carry a lot of them. You know, literally  
14 lift them up and get them onto the ladder. So I just --  
15 you know, I support the road. Thanks.  
16 **DAVID MORRIS:** My name is David Morris. I'm a  
17 newcomer to the community. I did spend 30 years working  
18 on Alaska state ferries and I do understand ferries and  
19 traveling back and forth. In my opinion, the ferry is  
20 not an option in this area.  
21 I've been here for a year and seen the weather  
22 patterns and stuff like that and a ferry or a  
23 hovercraft, I don't believe is -- shouldn't even be  
24 thought of as an option, because the size of the ferry  
25 you're going to have to use to go through -- like he

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1 said, cutting through the ice or through some of these  
2 waves is going to be much larger than they can even  
3 sustain. So I think the road is the only option.  
4 As far as the road affecting wildlife, the  
5 pipeline is a great monument to that. They said, well,  
6 nothing is going to travel under or nothing is going to  
7 live around it, but they were proven wrong in that  
8 because wildlife is resilient. They will do what they  
9 need to do to survive. Whether the road is there or  
10 not, they're going to survive. And, you know, they  
11 survive earthquakes, landslides, and everything else  
12 that changes their environment. They say, well, this is  
13 moot so we're just going to move over here.  
14 And I don't think that the road is going to  
15 hurt anything in the Izembek, you know, but it will be  
16 monumental for this community to -- I've only been here  
17 a year and I've been stranded in Cold Bay and on this  
18 side at least ten times trying to get in and out of  
19 here, and that's just me in one year. But I totally  
20 support the road. Thank you.  
21 **DELLA TRUMBLE:** All the places we went to, you  
22 or somebody was up in the front, because technically  
23 we're supposed to be testifying to you as the  
24 government. I think -- you know, I think it would be  
25 good if you go on the other side of the table so the

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1 people up there can look at you.  
2 **HELEN CLOUGH:** Sure. I would be happy to.  
3 **DELLA TRUMBLE:** Jacki, look her right in the  
4 eye, Jacki, and you tell her why we need this road.  
5 **HELEN CLOUGH:** Whatever works for you. I  
6 don't bite. I promise.  
7 **JACKI BRANDELL:** My name is Jacki Brandell.  
8 I'm a mother. I have lived in King Cove for many years.  
9 Our families have lived here for many years, and we  
10 deserve to have a road to Cold Bay. We deserve -- we  
11 should never have had that right taken away from us in  
12 the first place.  
13 We've lived here for thousands of years  
14 without interrupting the wildlife, coexisting peacefully  
15 with the wildlife, living off the wildlife, and it's  
16 worked for how many years? How could someone come in  
17 and say, no, you can't have this road because you're  
18 gong to harm the wildlife? We care about the wildlife.  
19 We care about our people. Our children are going to  
20 fight for this road for as long as it takes until it  
21 happens. We're passionate about it and it's something  
22 that -- it should be done to justify our lives.  
23 We are important. We are more important, I  
24 would say, than to some proposed harm for a bird on a  
25 road that you don't even know for sure are going to be

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1 harmed, despite just building that road. We care about  
2 the animals and we will take care of them because we  
3 need them to survive. And we know that and we will  
4 continue to fight for this road.  
5 **HELEN CLOUGH:** Thank you very much.  
6 Next?  
7 **JOSHUA GOULD:** Hello. My name is Joshua  
8 Gould. I am a fourth generation resident of King Cove,  
9 Alaska. And my family before that lived here, lived all  
10 over the Aleutians nearby, Belkofski and Unga Island. I  
11 am an Aleut. And I've given testimony before. I do  
12 have a couple questions for you.  
13 I want to be clear, once this road is put  
14 through Izembek, it becomes State land; is that correct?  
15 **HELEN CLOUGH:** The corridor on which the road  
16 is built, yes, would belong to the State.  
17 **JOSHUA GOULD:** Is there a concern that the  
18 State will not take care of the area that the refuge was  
19 on before?  
20 **HELEN CLOUGH:** I think for some people, but --  
21 you know, it would be State land. There would be some  
22 limits on what they can or cannot do with it, but it  
23 would be, you know, their land to manage and their  
24 responsibility to maintain the road.  
25 **JOSHUA GOULD:** As a 34-year lifelong resident

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1 of King Cove, one of the things I want to say, I really  
2 respect my elders. And a lot of them who have testified  
3 here and a lot of the others who haven't, we have  
4 learned so much from them. And I'm inspired by a lot of  
5 the younger people who have testified as well.  
6 And you'll notice that throughout this course  
7 some of the younger people have actually -- you know,  
8 had mixed feelings about this because they're concerned  
9 about the wildlife also, as am I. I care about it. And  
10 I'm glad that there was a refuge, you know, throughout  
11 the whole -- you know, throughout the country because I  
12 enjoy nature and what's there. It's a part of who we  
13 are. And it's something that should be taken care of.  
14 And even though the land transfer -- I'm  
15 guessing that, you know, the Fish and Wildlife -- will  
16 they be able to monitor the people there or will they  
17 not?  
18 **HELEN CLOUGH:** I certainly hope so. I can't  
19 guarantee what our budgets are going to be like in the  
20 future, but, yeah, it would be our responsibility to --  
21 you know, if the road is built, to validate what impacts  
22 occur or not and to make sure that things are --  
23 **JOSHUA GOULD:** There are people who -- within  
24 the community who care also and can take care of what  
25 needs to be taken care of there, the land and the

1 animals. One of the things that my grandfather said --  
2 as I'm told. He died before I was born. But one of the  
3 things that he said was, "There's right and there's  
4 wrong. Do right." And that's something that has been  
5 passed down onto me, and I try to do right.  
6       There's a lot of different stages in life that  
7 people go through as they mature and get older and grow.  
8 Some of those types of things become more important to  
9 people. Like I'm concerned that that type of thing gets  
10 passed along to my children. I have several children,  
11 and I'll be passing those types of things along to them.  
12 We need to depend on taking care of our community and  
13 the land and the wildlife there.  
14       And something else. I've been told a lot of  
15 stories that -- during my grandfather's time, a lot of  
16 people really did live off the land. And when one  
17 person went hunting, if they did well, they took care of  
18 the community. And, you know, you don't see as much  
19 hunting become modernized. And one of the -- I think  
20 that with that modernization and this road, you'll see  
21 that we're changing and you'll see that we'll always  
22 take care of the land and the wildlife. And that's all.  
23       **HELEN CLOUGH:** Thank you very much.  
24       **JOSHUA GOULD:** Thank you.  
25       **LEFF KENEZUROFF:** Hello. My name is Leff

1 children. We've got to look to their future and try to  
2 keep on going for our kids. Thank you.  
3       **HELEN CLOUGH:** Thank you very much.  
4       Others who care to speak?  
5       **DELORES KOCHUTEN:** I'm Delores Kochuten, and I  
6 was born here in King Cove and was raised in Belkofski,  
7 the village. I work -- I'm on the Belkofski Tribe and I  
8 work for them as an environmentalist and I want this  
9 road.  
10       I've had -- I've lost family because of  
11 medical, can't get out of here. My sister had a baby on  
12 board, on a boat, between here and Cold Bay. She's lost  
13 a baby. And we need this road. I've had medical  
14 conditions happen to me where I've sat here for two  
15 days. In 2011, where my ankle was broken in three  
16 places, and sitting up there suffering and waiting for  
17 the weather to calm down, had to crawl down to the boat  
18 and climb on a boat to get to Cold Bay and trying to get  
19 up the ladder in Cold Bay with a broken ankle. It was  
20 pretty scary, trying to climb off the boat in Cold Bay  
21 to catch an airplane to get out. And then coming back,  
22 the weather was bad. I did the same thing, had to climb  
23 down to come back over here with broken bones. And I  
24 think we need this road. That's all I can say.  
25       **GERALDINE WILSON:** Hi. My name is Geraldine

1 Kenezuroff. I'm the corporation president. I'd like  
2 to -- I'm proposing to put that road in. I've had quite  
3 an experience. I've been medevaced out of here, thanks  
4 to people that helped me out, got me out, in time. If  
5 it weren't for them, I wouldn't be here talking to you  
6 right now.  
7       I just want to say that -- seriously if they  
8 can put the road in. We really need it. I had a  
9 medevac, my wife, heart attack. She got sick. And we  
10 had to get her out of here in bad weather. We had to  
11 call the Coast Guard. The Coast Guard had to wait for  
12 an extra hour to get up here to Cold Bay to get her out.  
13 And I was left behind, but I caught the plane the next  
14 morning.  
15       And I just wanted to say, my experience -- I  
16 do believe real bad we need a road to access Cold Bay  
17 for medevac reasons. Our children, when they grow up,  
18 they need some kind of transport besides boat in rough  
19 weather and can't make it across the bay. Cold Bay can  
20 be pretty rough and icy in wintertimes.  
21       And I've seen it many years back in the day,  
22 and I know the country back there. We used to have an  
23 Army station over there. We used to have trucks coming  
24 back where we wanted to get the road in there. I can't  
25 see why we can't to save human life and our kids and our

1 Wilson. And I am for this road because not even two  
2 months ago I had to wait five days to get out of here on  
3 medical, and it was life-threatening. And that five  
4 days was a long time. So I'm definitely for this road.  
5       **HELEN CLOUGH:** Thank you.  
6       Others?  
7       **SIMEON KUZAKIN:** Hi. I'm Simeon Kuzakin from  
8 Belkofski. You know, in my day, there were no roads  
9 them days, you know. And we used to go hiking and we  
10 used to hike from Belkofski to Cold Bay, and all we  
11 walked on was bear trails. There were so many bears  
12 around they made their own trails, and we walked in the  
13 bear trails. And that was good walking.  
14       And we used to go to Cold Bay, and we used to  
15 hunt in Izembek, you know. And we'd get -- we never  
16 wasted nothing. We got what we wanted and we went back  
17 home. And caribou, the same way. And we never wasted  
18 nothing. No roads and stuff like that.  
19       And one time we went to Cold Bay and  
20 (inaudible) couldn't get down the ladder. So the boat  
21 heisted up the crab pot, put him in the crab pot, and  
22 put him on the boat. And it was pretty bad, them days,  
23 you know, going to Cold Bay. We only had the small  
24 boats. Nowadays they have bigger boats, but still have  
25 a hard time. And if they put that road in, it will make

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1 a lot of difference. And I wish they'd do it right  
2 away. Thank you.  
3 **HELEN CLOUGH:** Thank you.  
4 Others?  
5 I see Della. She's not going to let you out  
6 of here unless you talk.  
7 **DALE GOULD:** I've got to make a comment  
8 individually as a subsistence hunter first, because I'm  
9 currently the president of the Agdaagux Tribe. I  
10 believe as far as swans that we have, in Cold Bay, a  
11 subsistence hunt coming up in August. I do have a  
12 friend in Cold Bay that loves swans. I know my freezer  
13 is getting pretty thin. We'll see if we can't take care  
14 of those for her.  
15 As the president of the Agdaagux Tribe, I  
16 thank everybody for showing up and making their  
17 comments. I know Della, Dean, Gary Hennigh, Stanley,  
18 and other members of the community have put years and a  
19 lot of time into this to try to get this road passed.  
20 They say if you give it enough time, your turn  
21 will come. Well, May 24th of this year, I was out for  
22 medical, came back on the 30th, stuck in Cold Bay for  
23 two days, and then ended up getting medevaced out for  
24 heart-related problems. Thankfully I was on the Cold  
25 Bay side instead of King Cove side or else it could have

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1 been a different outcome. But we do need this road, and  
2 I thank you.  
3 **HELEN CLOUGH:** Thank you.  
4 Anyone else?  
5 For those of you that don't want to speak,  
6 too, we have forms in the back that you can write on.  
7 You know, you don't have to write long. You can write  
8 short comments. I know speaking in public is not  
9 everybody's favorite thing to do. And, you know, you  
10 can send us e-mails. I mean, there's many ways to  
11 comment. But is there anybody else that would like to  
12 speak this evening?  
13 Gary would like to add to his comments. Oh,  
14 you have the letter from Mayor Mack.  
15 **GARY HENNIGH:** I would like to read this  
16 letter into the record. For those of you that haven't  
17 signed the petition, in the back, please do. We're up  
18 to about 50 people so far. This is a letter going to  
19 Helen's boss, Secretary Salazar, who is the Secretary of  
20 the Interior. He's the person who has the ultimate  
21 authority to make this decision. That was in the law  
22 that President Obama signed in 2009.  
23 "Dear Secretary Salazar: We, the undersigned  
24 residents of King Cove, Alaska, speak loudly tonight,  
25 May 10th, 2012, in support of a road connection from our

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1 community of King Cove to the Cold Bay Airport.  
2 "Our lives continue to be impacted in many  
3 ways because we do not have this road link. The King  
4 Cove Corporation and the State of Alaska are willing to  
5 exchange lands with the federal government on a more  
6 than 200-to-1-acre-for-acre basis. That's  
7 200-to-1-acre-for-acre basis. This is more than fair.  
8 We are even willing to accept reasonable regulations on  
9 who, how, and when this road can be used.  
10 "The waterfowl and wildlife in the Izembek  
11 Refuge are indeed special, but so are we, the residents  
12 of King Cove. We have coexisted together and will  
13 continue to do so with this road.  
14 "We need to know that our government cares  
15 about us. We firmly believe we are the public interest  
16 that Secretary Salazar must respect and honor in making  
17 his final decision for approving the land exchange and  
18 for either of the two road corridors. Thank you, at  
19 least 50 residents from the City of King Cove."  
20 **HELEN CLOUGH:** Thank you, Gary.  
21 **MAKRINA MACK:** I'm Krina Mack, the Belkofski  
22 Corp -- vice president of the Belkofski Corporation, and  
23 I do support the road. I just want to say, I have a  
24 grandson. He asked me today, he said, "Where are you  
25 going?"

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1 I said, "I'm going to a meeting."  
2 And he said, "What meeting are you going to?"  
3 I said, "I'm going to a road meeting."  
4 And he said, "Oh, I want that road to go  
5 through."  
6 And I said, "Well, why?"  
7 He said, "Maybe one of these days my kids will  
8 drive me over to Cold Bay."  
9 And he's thinking ahead of time. You know,  
10 he's thinking this road -- he's got good thoughts of  
11 this road. And I know that a lot of kids, I've heard,  
12 talk about the road going to Cold Bay. And the -- the  
13 wildlife, there's a lot of wildlife around, especially  
14 in Anchorage. The airplanes, the airport, those don't  
15 bother any bird's habitat. They stay right there.  
16 We live in a community where there's a lot of  
17 birds, there's a lot of feeding for these birds around  
18 the shoreline, and nobody bothers those birds. They're  
19 there for the rest of their lives. Even if we kill,  
20 they're still going to stay there.  
21 We have a road that's gone from -- up to the  
22 new ramps and the old ramps. That's bear country. And  
23 the bears do come every year. We don't bother them.  
24 They don't bother us if we don't bother them. And  
25 they're there -- well, they're in the snow. But, you

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1 know, they never did move. We moved in on them. But  
2 we're not going to move either. And I don't think the  
3 birds are going to move either.  
4 And with all the eelgrass and all this new  
5 grass we had at the lagoon and down towards Len's Harbor  
6 and stuff, that's where these birds are going to stay.  
7 They're going to stay there and they're going to have  
8 their nesting there. Every year they're going to come  
9 back whether we are there or not. And I'd like to see  
10 this road go through. Thank you.  
11 **HELEN CLOUGH:** Thank you.  
12 Others? Anyone else?  
13 **DELLA TRUMBLE:** Dean, get up there.  
14 **HELEN CLOUGH:** Yeah, you don't have -- I mean,  
15 I know Della would like to hear people speak and I like  
16 to listen to you, but --  
17 **DELLA TRUMBLE:** I will say something in  
18 closing. I guess -- this is Della Trumble again.  
19 I guess I know there's a lot of people in this  
20 community that aren't here right now that have an  
21 opinion in regard to this issue, a strong opinion, and  
22 in support of the road. And coming next week, until the  
23 18th, we will make sure that every voice that wants to  
24 be heard will be represented, plus all the others that  
25 we've gotten that are in the process of getting letters.

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1 And I, to be honest with you, feel bad for  
2 this community. I mean, it's probably 30 times over the  
3 years that we put people in this position, saying the  
4 same thing over and over and over again. And we've been  
5 through it enough. There needs to be -- this needs to  
6 be resolved.  
7 Helen, I know you stand here today  
8 representing the Secretary and -- in his absence. And  
9 he needs to really understand how important this is to  
10 the point of having to make a decision that involves the  
11 lives of the people in this community, that he needs to  
12 come out here and visit us to fully understand the  
13 situation. Because to make a decision without coming  
14 out here and firsthand talk to the people of how  
15 important this is to this community is basically a slap  
16 in the face.  
17 Too much time and money has been spent as we  
18 continue to use lives and compromise people's lives.  
19 And enough is enough. This can be worked out. I've  
20 said it in every community that we've done this.  
21 There's no reason that all the parties can't step to the  
22 table. When Mr. Ashe comes out, we need to be talking  
23 mitigation and how we can resolve these issues and  
24 concerns and move forward and get this road built.  
25 Because, like I say, enough is enough.

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1 Stanley and I and Gary aren't getting any  
2 younger, so we're recruiting our kids here. With that,  
3 thank you for coming.  
4 **HELEN CLOUGH:** Thank you very much, Della.  
5 One last chance. Would anyone else care to  
6 comment on the record? Otherwise, I will let our --  
7 **DALE GOULD:** I wanted to comment again. I  
8 wanted to clarify that even though I said that there  
9 were mixed feelings with some of the -- you know,  
10 younger in the community, a lot of that has, you know  
11 changed. And you'll see, young Mr. Dustin Newman there,  
12 originally he had concern for the wildlife and the  
13 refuge, but he's a support for the record, as am I. I  
14 don't know if I made that clear in my first comment.  
15 But I think that you'll have full support from  
16 the community that the road is the best option. And I  
17 think that -- I think we can take care of it. I think  
18 that we'll be able to -- as a community, we'll be able  
19 to, you know, influence our younger generations. And  
20 I'm not afraid to say to any other community members,  
21 friends, or neighbors or family if you're doing  
22 something wrong, something should be said, and I don't  
23 think that there would be that problem. We're just the  
24 type of community that has respect for our lands.  
25 Thanks again.

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1 **HELEN CLOUGH:** Thank you very much.  
2 **RITA UTTECHT:** At least I can face this way.  
3 I'm glad I was one of the last ones.  
4 My name is Rita Uttecht. And just on a  
5 personal note, with a lot of the issues that we've had  
6 with medical with me, for one, the first medevac plane I  
7 was ever on was with my son when he was two -- two  
8 months old. He had meningitis and woke up in the  
9 morning, he had a fever of 105, and it was foggy out,  
10 summertime, you know, what do we do? No planes were  
11 flying. And luckily my dad was able to take us over on  
12 his boat.  
13 Now two months old, so of course we had to  
14 have a health care provider come with us, mid level.  
15 And my husband and I, my dad, and the mid level went  
16 over and -- it took a couple of hours to get there.  
17 Luckily, it was a nice ride, had to -- you know, imagine  
18 a little baby. Of course we couldn't -- there was no  
19 way we were going to pack him up the ladder, and so he  
20 actually had to be hoisted up with his car seat. And of  
21 course, you know, being a first-time mom, being young,  
22 that was kind of disturbing for a while, you know,  
23 watching your two-month-old swaying in the air with the  
24 car seat.  
25 So that -- we got him out to -- met the

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1 medevac plane. It was already in Cold Bay, so that was  
2 a huge plus. They just were waiting for us to get  
3 there, you know, the two-and-a-half-hour boat ride.  
4 Luckily we got there because to this day he is still  
5 talked about, you know, the learning and all the health  
6 aides learning -- his meningitis stats are still talked  
7 about, that they're shocked he is still here, he is  
8 still alive. He's right back there.  
9 He had one to seven blood ratios and it was  
10 just crazy that we -- they caught it in time. And if we  
11 had to wait for a flight, if we did not have my dad in  
12 that day, because it actually was fishing season, so if  
13 he was not able to even be here, no boats were in town,  
14 it was -- yeah, he would have passed away for sure.  
15 And the second time, I was -- gone out for  
16 medical, my son was two years old. And he actually was  
17 hurting here for about two weeks. The clinic wanted to  
18 wait, and we had ugly weather. And so, again, we had to  
19 wait. Finally, eventually got out to Anchorage, a boat  
20 ride, everything just the same. I believe it was  
21 summertime again, and got him out and he actually had  
22 intussusception.  
23 And now previous -- I don't know if we just  
24 had some -- we just had somebody pass away, actually, in  
25 town with intussusception, a baby. I don't know if it

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1 was right before or right after, but he was lucky to be  
2 alive with that, too. So just being in 2007, I already  
3 had two with him, you know, two medevac experiences. I  
4 would have lost my son.  
5 And he actually got to be out on the boat as a  
6 passenger this time, not as an actual patient. But I  
7 was medevaced out last year, June. And I was having  
8 pains, and it was ugly weather. And, again, my dad was  
9 available as, you know, having his boat. And so it was  
10 a nice day, so my husband came with me and my dad and my  
11 kids wanted to go for a boat ride. And it was foggy  
12 weather, not terrible, but foggy weather here where no  
13 planes could fly.  
14 My dad is like, "Sure. Come on. And come see  
15 mom, hug her good-bye." They actually came with us, and  
16 it was really choppy at the Cold Bay dock. And it took  
17 a lot to get me -- to get me up the ladders for sure.  
18 My dad or my husband was behind me and then I had two or  
19 three, the EMS, in front of me trying to pull me up,  
20 trying to -- trying to -- if you can imagine, I mean,  
21 the stairs are stone cold, not like you prepare for it  
22 or nothing like that. They're so cold and you have  
23 to -- it's not like just a little hop, how people say,  
24 getting on the stairs. It's like how many feet away.  
25 You have to like literally not do the splits

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1 100 percent, but I'm a big girl and it took a lot to get  
2 me up there and with how many guys pushing me up in  
3 pain, that is the worst thing to do, is to go up there  
4 in that moment in pain. And with our medevacs and  
5 stuff, it's not only with leaving, but when you come  
6 back, you know, you want to come back home when you're  
7 all better, but a lot of people actually can't make it  
8 home either on this side like with a broken leg. You  
9 definitely can't -- like how Della was saying, you can't  
10 just hop down the steps. You're stuck there for a  
11 couple of days until weather gets better.  
12 We wish to have the road to easily access the  
13 Cold Bay hub. It's our hub. It's our lifeline. We  
14 have so many elders that have had to move out of town  
15 because of them not being able to get the care they have  
16 here. My Grandpa Gould is an example of that.  
17 He's -- they have a house in Bellingham,  
18 Washington, and his wife is sitting in the audience back  
19 here, Elaine Gould. And they've had to leave numerous  
20 times because of his health, where this last episode was  
21 on Christmas Eve. He was hurting and luckily we have my  
22 dad with his boat. He was able to take them over. And  
23 I personally wasn't on the boat that day, but my husband  
24 was; my uncle, Dale Gould; my dad, Dean Gould. And they  
25 had to actually take him up the steps, and here my uncle

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1 Dale, he was hurt as well. So it took how many people  
2 to get him up, and my husband could not believe how much  
3 pain my grandpa was in. He said it was definitely hard  
4 to see for sure.  
5 We had snow that day. You know, it was  
6 definitely not nice conditions on top of having to climb  
7 the ladder, you know, being in pain. And he had the  
8 surgery right away that night, Christmas Eve night. If  
9 he didn't make it out that day by the boat, he would  
10 have -- he would not be here today.  
11 And he actually did not come back home until  
12 he -- well, he's not 100 percent better yet, but he is  
13 near. He is working on getting better. And he actually  
14 didn't come home until just last month, and that's four  
15 months away.  
16 So it's terrible that people who are elders  
17 can't even come back to their home. We have so many  
18 people who want to spend their lives -- the rest of  
19 their lives here in town if -- when they're older,  
20 elder, and it's getting close to the end where you have  
21 to have the hospice care, and they can't even have that  
22 here because of not being able to get out of town. You  
23 know, they do not want -- they want to be home, but they  
24 don't want to, you know, come home to die, per se, like  
25 right now just because it's ugly weather. But that is a

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1 hard pill to chew, that our elders can't even safely  
2 come home because of our weather and our transportation  
3 issues.  
4 And it's -- yeah, it's definitely very sad.  
5 We need it. It's something that I hope that we'll have  
6 soon because I don't want to see any more lives lost.  
7 Thank you.  
8 **HELEN CLOUGH:** Thank you.  
9 Anyone else?  
10 **DAVID MORRIS:** Dave Morris again. I just -- I  
11 think, for the record, they need to have the -- which  
12 dock they're talking about at Cold Bay, because it's  
13 like a quarter of a mile off the beach. And the steel  
14 ladder, you can -- depending on the tide, it might be  
15 30 feet to the top of it that you're climbing up. So I  
16 think somewhere in there, there needs to be a picture of  
17 that dock that Rita was referring to, because it's not  
18 something that anybody wants to climb up and down if  
19 they're hurt.  
20 **HELEN CLOUGH:** Thank you.  
21 Anyone else?  
22 **GARY HENNIGH:** Gary Hennigh again. Just one  
23 final comment. Please, if you haven't signed in to show  
24 that you were here, please do so. If you haven't signed  
25 the petition, please do so. And, everybody, please take

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1 an orange, an apple, a handful of grapes, cookies.  
2 Those are all provided by Helen and the government and  
3 Joan, so please take the food so we don't have to take  
4 it any further and carrying it -- well, you carry it  
5 out. But please sign the petition, sign the fact that  
6 you were here. That record is very important. And  
7 thank you all on behalf of the service for showing up.  
8 **LONNIE BRANDELL:** I've got one question.  
9 **HELEN CLOUGH:** Sure.  
10 **LONNIE BRANDELL:** Don't know if the pilots  
11 that fly in and out of here, if they're against the road  
12 or are they for the road? Have they ever made a  
13 testimony to say what they go through with people losing  
14 their lives? I mean, you know, when you're in their  
15 plane and they close the door and take off, you're in  
16 their hands. Have any of them ever made a testimony to  
17 say, hey, as pilot, you know?  
18 **HELEN CLOUGH:** I don't --  
19 **LONNIE BRANDELL:** Does anybody know about  
20 that?  
21 **HELEN CLOUGH:** Gary may have something.  
22 **GARY HENNIGH:** Yes. Gary again. Excellent  
23 question, Lonnie. And at the meeting Thursday night,  
24 last Thursday night in Anchorage, Orin Seybert showed  
25 up. Orin talked about the history, serving King Cove.

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1 He said if there was any community that ought to have a  
2 road because they can have a road because of how close  
3 they are to Cold Bay, it needs to be King Cove. Orin  
4 says, "I've got great pilots. We do the best we can,  
5 but there are times when Mother Nature works against  
6 us." So I take it right from the top, Orin, what he  
7 said. He went on record back in 1995 when we first  
8 started this to Senator Stevens, then Senator Frank  
9 Murkowski, and Don Young, said the same thing, that we  
10 love the people in King Cove, but we will be very happy  
11 when the day comes that there can be a road so that we  
12 don't have to get in there at times when we don't want  
13 to get in there.  
14 So, to me, whatever the pilots say is fine,  
15 they're good guys as we all know, but Orin saying what  
16 he said, I think, speaks to where PenAir is on that  
17 issue.  
18 **LONNIE BRANDELL:** Right. Yeah. I mean, I  
19 know the pilots, the stuff they come in on sometimes,  
20 and I take my hat off to them.  
21 **GARY HENNIGH:** Thanks.  
22 **HELEN CLOUGH:** Thank you.  
23 Well, again, I thank you very much for coming  
24 and for speaking from your hearts and sharing the  
25 information with us. And we certainly will --

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1 obviously, we'll have the transcript of the meeting.  
2 And then I do hope that we will at least have Director  
3 Ashe -- obviously, I can't speak for the Secretary --  
4 maybe his representative -- but I'm pretty far from --  
5 but I appreciate what you're saying and I certainly will  
6 carry the message back that it would be nice if he would  
7 come.  
8 And, obviously, I'll be in touch with Gary and  
9 the mayors and Della and others. So, again, thank you  
10 very much for coming. Please help yourself to goodies.  
11 And I really appreciate your time and all the effort  
12 you've put into this.  
13 (Proceedings adjourned at 8:30 p.m.)  
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REPORTER'S CERTIFICATE

I, VALERIE MARTINEZ, RPR, and Notary Public in  
and for the State of Alaska do hereby certify:

That the proceedings were taken before me at the  
time and place herein set forth; that the proceedings  
were reported stenographically by me and later  
transcribed under my direction by computer  
transcription; that the foregoing is a true record of  
the proceedings taken at that time; and that I am not a  
party to nor have I any interest in the outcome of the  
action herein contained.

IN WITNESS WHEREOF, I have hereunto subscribed  
my hand and affixed my seal this 24th day of May, 2012.

\_\_\_\_\_  
VALERIE MARTINEZ,  
Registered Professional Reporter  
Notary Public for Alaska

My Commission Expires: June 22, 2014

		7:14	69:20;70:12,16,21,24; 71:5,15;72:7,25;73:11, 13	37:14,16,17,22,22
\$	2	500 (1)		airline (2)
\$1 (1)	20 (1)	18:24	add (3)	40:19,19
35:16	33:6	56,393 (2)	35:11;36:5;63:13	Airlines (2)
\$150 (1)	200 (3)	49:7;50:25	addressed (1)	40:20,23
39:13	5:19;18:1;38:17		9:22	airplane (3)
\$150,000 (2)	2003 (1)	7	adjacent (1)	45:10;48:9;60:21
29:13;30:1	11:24	7th (1)	6:12	airplanes (2)
\$160,000 (1)	2007 (1)	50:12	adjourned (1)	52:8;65:14
30:1	71:2		77:13	airport (19)
\$21 (1)	2009 (2)	8	adjunct (1)	8:19;9:19;13:17;33:7, 15,18;37:8;40:4,17,18; 41:10,14,16,16,17; 48:17;50:10;64:1;65:14
29:25	4:24;63:22	8:30 (1)	adjust (1)	Akaka (1)
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<p><b>ugly (3)</b> 70:18;71:8;73:25 <b>ultimate (3)</b> 4:25;32:5;63:20 <b>umbrella (1)</b> 35:20 <b>Unangan (1)</b> 49:11 <b>uncle (2)</b> 72:24,25 <b>under (1)</b> 54:6 <b>underneath (1)</b> 48:24 <b>undersigned (1)</b> 63:23 <b>understood (1)</b> 33:11 <b>undesirable (1)</b> 13:1 <b>unequal (1)</b> 7:18 <b>unfair (1)</b> 26:23 <b>unfortunately (2)</b> 3:15;44:17 <b>Unga (1)</b> 56:10 <b>UNIDENTIFIED (10)</b> 19:16;20:4,20,23; 26:9,24;27:11,14;28:15; 51:13 <b>unique (1)</b> 18:2 <b>United (7)</b> 8:14;40:21;47:7; 48:24;50:4,13,24 <b>University (3)</b> 46:9,10,20 <b>unless (3)</b> 31:13;39:20;62:6 <b>unlike (1)</b> 23:7 <b>unprecedented (1)</b> 10:14 <b>unusual (2)</b> 23:10;30:18 <b>up (71)</b></p>	<p><b>URS (3)</b> 3:21;15:4;22:2 <b>use (11)</b> 7:8;11:11;20:1;25:25; 35:19;37:23;39:7;43:21; 47:25;53:25;67:18 <b>used (14)</b> 5:10;37:14,18;39:19; 45:18;47:2,4;59:22,23; 61:9,10,14,14;64:9 <b>using (3)</b> 25:8;37:16;39:6 <b>usually (1)</b> 19:11 <b>utilizing (1)</b> 36:21 <b>UTTECHT (2)</b> 69:2,4</p>	<b>W</b>	<p><b>wait (6)</b> 16:7;59:11;61:2; 70:11,18,19 <b>waiting (2)</b> 60:16;70:2 <b>walk (1)</b> 41:23 <b>walked (3)</b> 48:20;61:11,12 <b>walking (1)</b> 61:13 <b>wants (3)</b> 28:8;66:23;74:18 <b>War (1)</b> 8:19 <b>WARREN (12)</b> 29:1,11,16,22;30:4,6, 16;31:8,10;37:5,5,12 <b>Washington (2)</b> 19:9;72:18 <b>wasted (2)</b> 61:16,17 <b>watch (1)</b> 52:21 <b>watching (2)</b> 42:20;69:23 <b>water (2)</b> 47:11,17 <b>waterfowl (1)</b> 64:10 <b>waves (1)</b> 54:2 <b>way (15)</b> 12:13;25:17;29:23; 32:1;36:24;39:10;44:12; 45:10;47:3;49:15;50:20; 52:4;61:17;69:2,19 <b>ways (3)</b> 42:18;63:10;64:3 <b>weather (16)</b> 14:14;30:19;41:10; 50:20;53:21;59:10,19; 60:17,22;70:18;71:8,12, 12;72:11;73:25;74:2 <b>weed (1)</b> 21:21 <b>week (6)</b> 10:22,23;11:18;18:5; 40:5;66:22 <b>weeks (7)</b> 16:14;28:7;30:10,17; 39:8;40:5;70:17</p>	<p><b>Y</b></p>
<b>V</b>				
<p><b>Valerie (3)</b> 3:25;4:5;17:9 <b>validate (1)</b> 57:21 <b>value (17)</b> 7:16;8:13;34:21; 35:10,15,18,20,21,23; 36:2,7,13,16,20,23,25; 50:23 <b>values (1)</b> 33:25 <b>vehicle (1)</b> 45:11 <b>vehicles (3)</b> 6:16,24;43:24 <b>via (2)</b> 14:13,17 <b>vice (1)</b> 64:22 <b>view (1)</b> 24:22 <b>views (1)</b> 46:7 <b>village (2)</b> 38:19;60:7 <b>villages (1)</b> 37:20</p>	<p><b>Valerie (3)</b> 3:25;4:5;17:9 <b>validate (1)</b> 57:21 <b>value (17)</b> 7:16;8:13;34:21; 35:10,15,18,20,21,23; 36:2,7,13,16,20,23,25; 50:23 <b>values (1)</b> 33:25 <b>vehicle (1)</b> 45:11 <b>vehicles (3)</b> 6:16,24;43:24 <b>via (2)</b> 14:13,17 <b>vice (1)</b> 64:22 <b>view (1)</b> 24:22 <b>views (1)</b> 46:7 <b>village (2)</b> 38:19;60:7 <b>villages (1)</b> 37:20</p>	<p><b>watching (2)</b> 42:20;69:23 <b>water (2)</b> 47:11,17 <b>waterfowl (1)</b> 64:10 <b>waves (1)</b> 54:2 <b>way (15)</b> 12:13;25:17;29:23; 32:1;36:24;39:10;44:12; 45:10;47:3;49:15;50:20; 52:4;61:17;69:2,19 <b>ways (3)</b> 42:18;63:10;64:3 <b>weather (16)</b> 14:14;30:19;41:10; 50:20;53:21;59:10,19; 60:17,22;70:18;71:8,12, 12;72:11;73:25;74:2 <b>weed (1)</b> 21:21 <b>week (6)</b> 10:22,23;11:18;18:5; 40:5;66:22 <b>weeks (7)</b> 16:14;28:7;30:10,17; 39:8;40:5;70:17</p>	<p><b>will (2)</b> 64:4,8 <b>WILSON (16)</b> 29:1,11,16,22;30:4,6, 16;31:8,10;37:5,5,12; 46:5,5;60:25;61:1 <b>wind (2)</b> 41:16,25 <b>winds (1)</b> 50:17 <b>wings (1)</b> 38:25 <b>winter (5)</b> 30:8,18;37:7;38:17; 40:1 <b>wintertimes (1)</b> 59:20 <b>Wisconsin (1)</b> 51:22 <b>wish (2)</b> 62:1;72:12 <b>wishes (1)</b> 31:1 <b>within (4)</b> 6:8;12:9;32:19;57:23</p>	<p><b>year (14)</b> 29:13,13;30:10;36:14; 39:8,8;46:19;53:21; 54:17,19;62:21;65:23; 66:8;71:7 <b>years (26)</b> 3:14;4:23;35:14,14, 14;37:6;42:21;43:18,19; 45:13,13,14;47:19;48:6, 21;49:9;51:20;53:17; 55:8,9,13,16;59:21; 62:18;67:3;70:16 <b>Yep (1)</b> 30:15 <b>yesterday (2)</b> 14:15,16 <b>young (7)</b> 48:2,2,11;51:16; 68:11;69:21;76:9 <b>younger (6)</b> 43:6;57:5,7;68:2,10, 19 <b>youngest (1)</b></p>

52:19

## **APPENDIX G-3**

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### **SAMPLE COMMENT LETTERS**

**B. Examples of drawings and essays submitted by students from King Cove School**

Brian

I want a road from King Cove to Cold Bay. One reason is if someone in your family gets sick, you need help. Another reason is you would be closer to your family. Finally, if we drive to Cold Bay, there would be less airplane crashes and less people would die.

Having a road to Cold Bay will make travel easier and would be a way of saving lives. But there are also reasons for not having a road like to many animals are dying and will soon be extinct. But we need a road to travel on.

Sincerely,  
Brian Aichele  
Grade 3  
5-9-12



Almhh  
I need  
to get to  
doctor

The airplane  
fair is too  
much

NO Flights  
Today

Turn  
Around

# Permission to Publish Student Work on the Web

(for purposes of the proposed road corridor from King Cove to Cold Bay)

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Thank you.

---

(Please check the appropriate box below, fill out the form and return this portion to your child's classroom teacher.)

I give permission for my child to have his/her exemplary work, related to the proposed road corridor to the Cold Bay, published on the Internet. I hereby release, hold harmless, indemnify and defend the King Cove School and the Aleutians East Borough School District, its Board, officers, agents, directors, employees and volunteers from any and all liability and legal or equitable claims of any kind related to such work being published on the Internet. I understand that student work will be identified by the student's name.

No. I would prefer not to have my child's work published on the Internet.

Brian Aichele Child's name

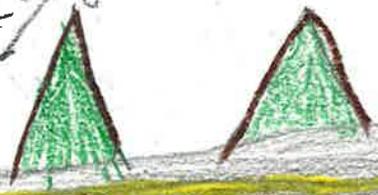
Mike Aichele Parent/Guardian name

Michael J. Aichele Parent/Guardian signature

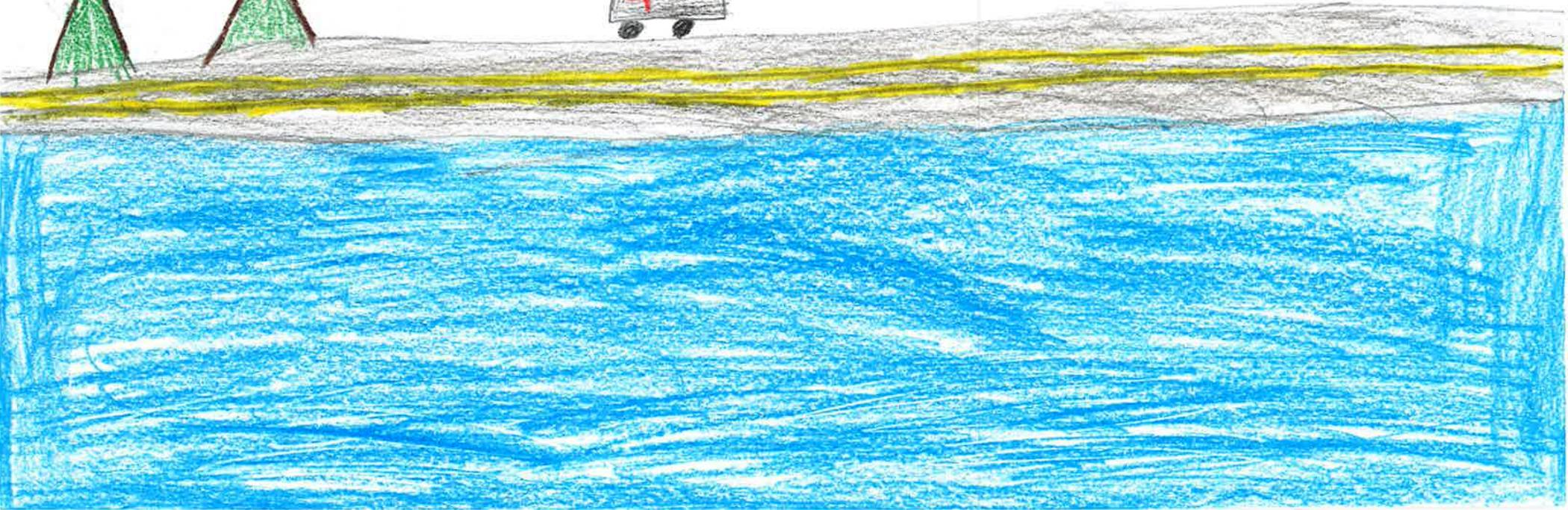
Why do I want a road from King cove to cold bay?



King cove



Cold bay →



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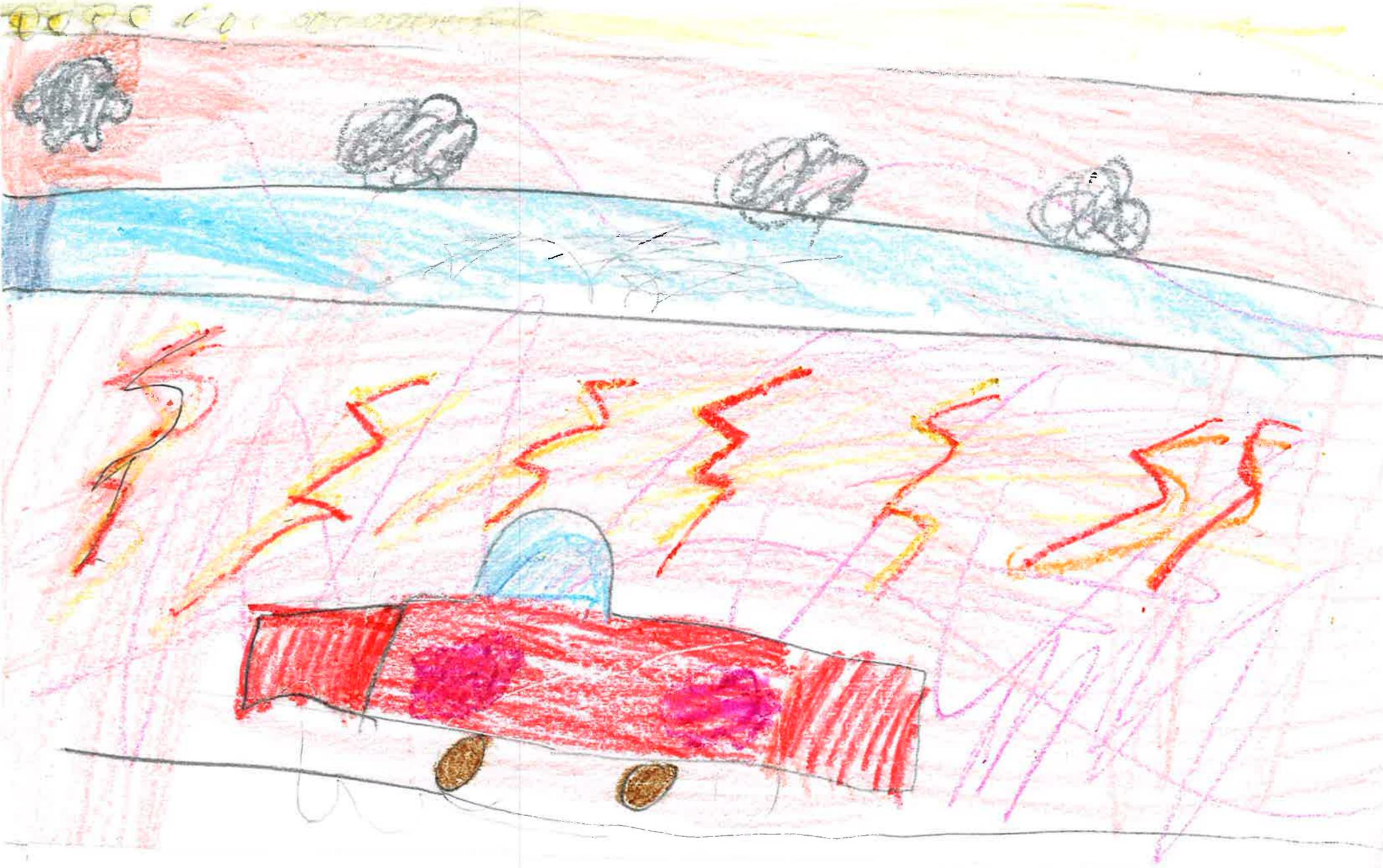
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No. I would prefer not to have my child's work published on the Internet.

Charlynn Brandell Child's name

Carisa Brandell Parent/Guardian name

Carisa Brandell Parent/Guardian signature



When the Weather is bad my dad could drive me to Cold Bay to get on the big plane.

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No. I would prefer not to have my child's work published on the Internet.

    Jailynn Brandell     Child's name

    Jacki Brandell     Parent/Guardian name

    Jacki Brandell     Parent/Guardian signature

Why do I want a road from  
King Cove to Cold Bay

To save peoples lives!

If we had the road I wouldn't be in heaven.



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No. I would prefer not to have my child's work published on the Internet.

CAYLA CALVEY Child's name

Joe Calvey Parent/Guardian name

Joe CALVEY Parent/Guardian signature

P.O. Box 213  
King Cove, AK 99612  
May 8, 2012

King Cove Corporation  
P.O. Box 38  
King Cove AK 99612

Dear Madam or Sir

My family likes to hunt and there is good hunting around Cold Bay. I like Ducks Unlimited because they preserve spots for the duck to nest and eat. Having ducks to hunt is important to my family, so we want to support Ducks Unlimited's fundraisers in Cold Bay, but sometimes we can't get there.

I want the road to Cold Bay because I want to go to the Silver Salmon Derby.

I want the road to Cold Bay because I don't want to get weathered in during a basketball or other trip. We want more teams to be on our schedule, but the weather is really bad, so they sometimes get weathered in or out.

If a pregnant lady has problems with her pregnancy, she needs to be able to get to Cold Bay and then to Anchorage. My family has heart trouble and we want to be able to get to doctors fast if needed. My grandpa hurt his foot and was weathered in here for a day before he could get to a doctor. Other people have broken bones and had to wait to get them set.

Thank you for reading my letter.

Sincerely,



Gary Gould Mack

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No. I would prefer not to have my child's work published on the Internet.

Gary Gould Child's name

Sunshine Gould Parent/Guardian name

Sunshine Gould Parent/Guardian signature

Candace Mack

~~Proposed Essay~~

There are many reasons that we should get the road from King Cove to Cold Bay. In the next few paragraphs I am going to tell why we need the road.

One of the main reasons that it would be good to have the road from here to there is so that we don't lose any lives. There were many times when the weather was too ugly for an air-ambulance to land here. There were also many incidents where couple people passed away here. There were also couple people that almost didn't make it out of here that had to take a two to three hour boat ride over to Cold Bay. The boat ride wasn't the best because it was super rough out it was hard for them to put the patient over the boat from the dock. That also requires that to pack things out of the ambulance that they can keep in there on the ride to Cold Bay. It takes a lot of work dealing with this weather and trying to keep the patient stabilized while waiting for the weather.

Another reason is that Cold Bay can come over to here for sporting events that they miss out on because of the weather. It can save the school in our district money from not having to charter a plane over for the students. The busses or their parents can drive them over because at one point in a time the busses drove up where the hovercraft was at to pick students who didn't have rides. The school can also start having field trips that go over to Cold Bay and learn about the wildlife that they don't see around airport. Cold Bay School students can also come on field trips over this way. They can learn things that go on over here that they don't do over there. It will also be a great thing for the school here and in Cold Bay.

The last reason that I am going to give is about people missing their plane out of Cold Bay that go to Anchorage because of our weather. When they miss their plane they have to call and change the date for their ticket and it costs money for it to be changed. It is bad for when people have surgery or check-ups have to change their flight because they have to go through the whole process of changing the day of their appointments too. It is hard changing these things especially your appointments, because they fill up fast and it is hard to get in when you are able to go out or have time.

There are some of my reasons why I think we should get the road from King Cove to Cold Bay.

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No. I would prefer not to have my child's work published on the Internet.

Candace Mack Child's name

Lora Mack Parent/Guardian name

Lora Mack Parent/Guardian signature

Devan Mack

5/3/12

## The Road To Somewhere

When you head out of the state of Alaska and ask a random person about the “Road to nowhere” they would have no clue what you are talking about. If you ask some locals about it, pretty much everyone would be up for getting the road to Cold Bay. Just because of all the reasons such as easier transport. If there's been an accident we could just drive to Cold Bay, and people can save money by driving to Cold Bay instead of flying.

A lot of people first hand have lost a few friends and family from not having the road to Cold Bay, because of bad weather. The small Cherokees can barely fly when it is blowing above 30 MPH. Even though we got a hover craft that we once had don't even use anymore couldn't even go out in bad weather. The road is always going to be there if whomever decides to grant the road.

Someone in my family has known from first hand how hard it is to get transportation here. My uncle had a ruptured appendix and had to get sent out in horrible weather of blowing about 50 mile per hour winds, and he was on the boat. It was very hard to dock up in that harsh weather, and they had to use the crane to lift him up to the dock. He even said “It was scary for me because I was on a stokes litter getting lifted on to the dock, but I had to go free for while in the air.” The scariest thing he said was when he was over the water and he was hoping the line would not snap.

If this weather keeps up like this last winter we had, it will be hard for whomever gets hurt and needs to be medevac out. We had at least five injuries in our town, we're very lucky the weather was not that bad so they made it out by plane. The plane won't always be there, but the road will always be there.

Not only will the road allow people to get to Cold Bay if they had a injury, but the mail could get through easier by car instead of waiting on a plane. When people make reservations to leave to

Anchorage sometimes they miss them, and same goes for clinic appointments. Its hard to get reservations for check ups, and also it cost money to cancel them. On the other side of things, mail is a somewhat priority to this town. Just because some people can't afford plane tickets out they spend there money over the internet and ship there clothes, toys, and or other objects.

The road to Cold Bay could be easier on Pen Air if bad weather happened they could just take a van over with all the mail instead of flying it over. Plane fuel cost more then regular gas so then they would be saving money instead of flying over to King Cove.

Just think of it in how many more years from now someone else might get hurt and not make it out because of bad weather. What will happen next, they will have to wait tell it clears up and they can make it out possibly the next day. I know I don't want to be that person that gets hurt and has to be medevac out in bad weather, so please pass the road so we have another way to get out

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Thank you.

Beverly Mack

(Please check the appropriate box below, fill out the form and return this portion to your child's classroom teacher.)

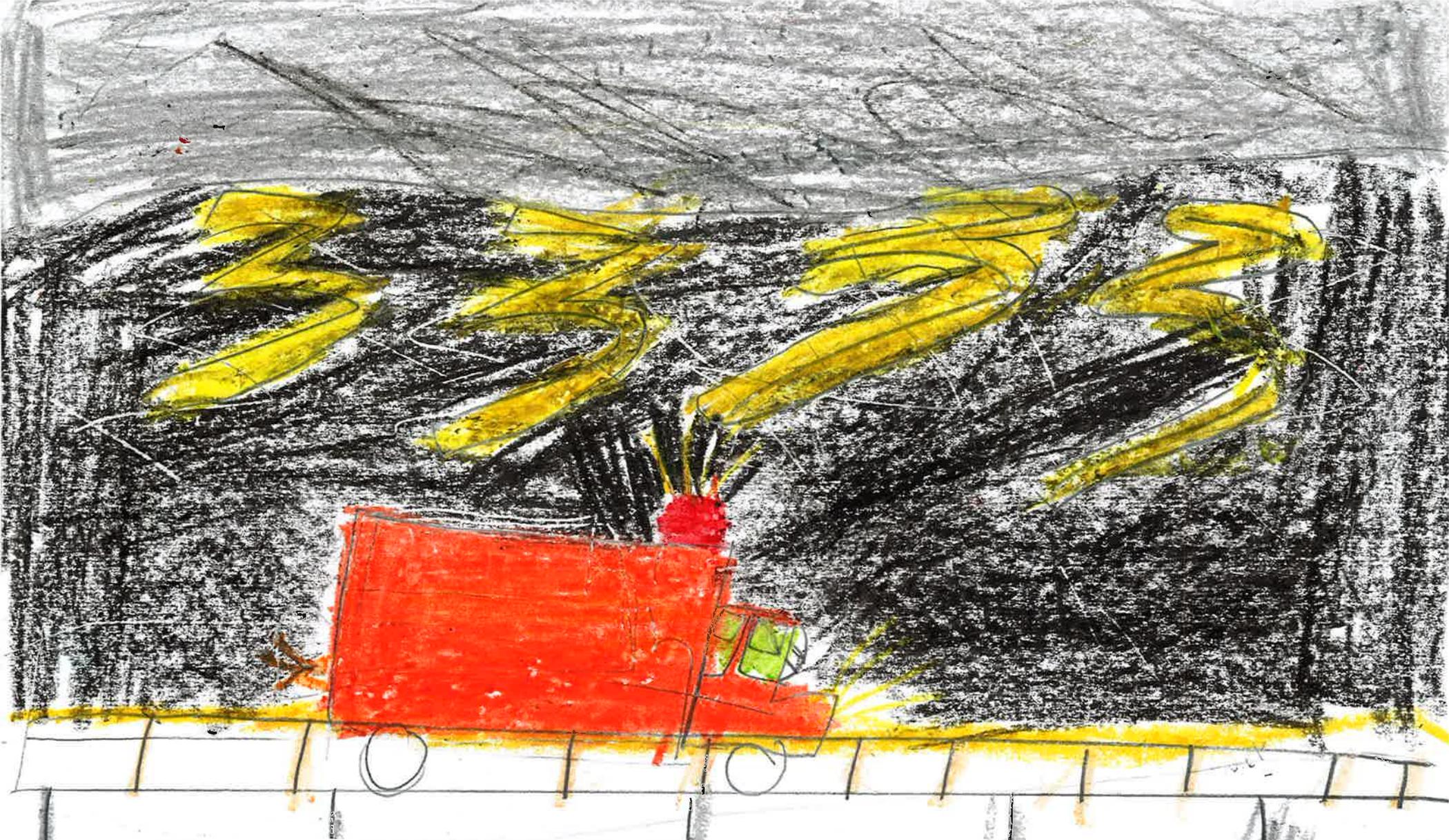
I give permission for my child to have his/her exemplary work, related to the proposed road corridor to the Cold Bay, published on the Internet. I hereby release, hold harmless, indemnify and defend the King Cove School and the Aleutians East Borough School District, its Board, officers, agents, directors, employees and volunteers from any and all liability and legal or equitable claims of any kind related to such work being published on the Internet. I understand that student work will be identified by the student's name.

No. I would prefer not to have my child's work published on the Internet.

Devan Mack \_\_\_\_\_ Child's name

Beverly Mack \_\_\_\_\_ Parent/Guardian name

Beverly Mack \_\_\_\_\_ Parent/Guardian signature



When the weather is bad people can't fly in small planes. With the road we would be able to drive to Cold Bay. I would also be able to visit my uncle on the weekends.

(Please check the appropriate box below, fill out the form and return this portion to your child's classroom teacher.)

I give permission for my child to have his/her exemplary work, related to the proposed road corridor to the Cold Bay, published on the Internet. I hereby release, hold harmless, indemnify and defend the King Cove School and the Aleutians East Borough School District, its Board, officers, agents, directors, employees and volunteers from any and all liability and legal or equitable claims of any kind related to such work being published on the Internet. I understand that student work will be identified by the student's name.

No. I would prefer not to have my child's work published on the Internet.

Carter Uttecht

Child's name

Darien Uttecht

Parent/Guardian name



Parent/Guardian signature



When you drive to Cold Bay you could see lots of animals and mountains.

# Permission to Publish Student Work on the Web

(for purposes of the proposed road corridor from King Cove to Cold Bay)

Dear Parents/Legal Guardians,

For the purpose of sharing with the community the exemplary work of the King Cove School students related to the proposed road corridor from King Cove to Cold Bay, the King Cove School would like to publish student work on various websites on the Internet. We are asking permission for your child's work to be published for a reasonable period of time. If you give your permission, please sign below and return to your child's teacher.

Thank you.

---

(Please check the appropriate box below, fill out the form and return this portion to your child's classroom teacher.)

I give permission for my child to have his/her exemplary work, related to the proposed road corridor to the Cold Bay, published on the Internet. I hereby release, hold harmless, indemnify and defend the King Cove School and the Aleutians East Borough School District, its Board, officers, agents, directors, employees and volunteers from any and all liability and legal or equitable claims of any kind related to such work being published on the Internet. I understand that student work will be identified by the student's name.

No. I would prefer not to have my child's work published on the Internet.

Taylor Child's name

Priscilla Miller for Amberly Weiss Parent/Guardian name

Priscilla Miller for Amberly Weiss Parent/Guardian signature

# Our road to Cold Bay

I want a road to Cold Bay  
because my family sometime  
are really sick and need to go to  
Anchorage where can see doctor.

The road will help people get  
to Cold Bay where the weather  
is too ugly for airplanes to fly  
people need to go to Cold Bay

When I'm sick, going on  
school trips or going to Anchorage  
last month I had to go to Cold Bay  
a day early because the weather  
was going to be ugly and I  
would of missed my trip to  
Anchorage! Spending the night in Cold Bay

Katie  
Katie

and I could missed my trip  
to Anchorage! Spending the night in  
Cold Bay. It was no fun  
because the rooms were really  
small and hot and I can spend  
all of my money there I had  
to play with there the road  
to Cold Bay could help the  
people who are scared to fly.  
I love my family and friends  
and if any thing happens  
to them I will be really  
sad that's why I Katie.  
Yatchmeneff wants the road to  
Cold Bay

Katie YatchMENEFF

# Permission to Publish Student Work on the Web

(for purposes of the proposed road corridor from King Cove to Cold Bay)

Dear Parents/Legal Guardians,

For the purpose of sharing with the community the exemplary work of the King Cove School students related to the proposed road corridor from King Cove to Cold Bay, the King Cove School would like to publish student work on various websites on the Internet. We are asking permission for your child's work to be published for a reasonable period of time. If you give your permission, please sign below and return to your child's teacher.

Thank you.

---

(Please check the appropriate box below, fill out the form and return this portion to your child's classroom teacher.)

I give permission for my child to have his/her exemplary work, related to the proposed road corridor to the Cold Bay, published on the Internet. I hereby release, hold harmless, indemnify and defend the King Cove School and the Aleutians East Borough School District, its Board, officers, agents, directors, employees and volunteers from any and all liability and legal or equitable claims of any kind related to such work being published on the Internet. I understand that student work will be identified by the student's name.

No. I would prefer not to have my child's work published on the Internet.

Katio Yatchmanoff Child's name

Shelley Allen Yatchmanoff Parent/Guardian name

Shelley Yatchmanoff Parent/Guardian signature

## **APPENDIX G-3**

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### **SAMPLE COMMENT LETTERS**

#### **C. Comments submitted by Cooperating Agencies**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

May 18, 2012

Stephanie Brady, Project Team Leader  
U.S. Fish Wildlife Service  
1011 East Tudor Rd., MS-231  
Anchorage, Alaska 99503

Re: EPA comments on the USFWS Izembek National Wildlife Refuge Land Exchange/Road Corridor Draft Environmental Impact Statement, EPA Project #09-046-DOI.

Dear Ms. Brady:

Thank you for the opportunity to review the Draft Environmental Impact Statement (EIS) for the Izembek National Wildlife Refuge Land Exchange/Road Corridor project near King Cove, Alaska (CEQ #20120081). We appreciate the tremendous effort of the U.S. Fish and Wildlife Service (FWS) to produce a reader-friendly and succinct document that clearly articulates the anticipated impacts of the proposed project. We believe that the visual graphics, maps, and impact summary tables are very useful to the reader. We also commend the FWS for developing a helpful project website.

We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. We have given the EIS an overall rating of EC-2 (Environmental Concerns-Insufficient Information). Our rating is based primarily on our concerns regarding the potential impacts to wilderness characteristics, a site on the Ramsar List of Wetlands of International Importance, hydrology, and habitat. We also believe that additional information concerning wetlands, the No Action Alternative, and historic properties should be included in the Final EIS. A description of our rating system is enclosed.

Although the EIS does not identify a preferred alternative, the analysis in the EIS indicates that Alternative 4, Hovercraft Operations from Northeast Terminal, is likely to be the environmentally preferable alternative. We recognize, however, that non-road alternatives may not be practicable or meet the purposes of the *Omnibus Public Land Management Act of 2009* (the Act) and so believe that it is prudent to identify an environmentally preferable road alternative. Based on the information currently presented in the Draft EIS, it appears that Alternative 3, Land Exchange and Central Road Alignment, may be the environmentally preferable road alternative.

As stated above, we believe that several areas in the EIS need additional information to fully disclose impacts and to achieve the coordination with other permit actions required under NEPA. Below are the specific issues we believe warrant additional consideration for the Final EIS:

### **Purpose and Need**

The DEIS indicates that the primary need is a land exchange for the purpose of constructing a road. Therefore, it is unclear if the non-road alternatives currently being evaluated in the EIS truly meet the purpose and need, or if the Secretary can deem these alternatives to be in the public interest, or if a public interest review would be necessary. We recommend that the Final EIS include additional information about the criteria for the Secretary's public interest review as well as reconcile the legal requirements of the Act with the "nestled" purpose and need in the Final EIS.

### **Environmentally Preferable Alternatives**

As stated above, based on information in the DEIS, it appears that Alternatives 4 and 3 are environmentally preferable. We believe that overall, Alternative 4 incurs the least impacts to a variety of resources while meeting the "nestled" purpose and need stated in the Draft EIS. However, because it is unclear if the Secretary can find a non-road alternative to be in the public interest, we have also reviewed and compared Alternatives 2 and 3, the two road alternatives. Because Alternative 3 impacts 1.4 fewer acres and requires fewer stream crossings than Alternative 2, Alternative 3 results in less impact to aquatic resources. We recognize that additional information needs to be gathered for permitting actions that will be required for this project. Based on that more detailed information, changes to the selected alternative may be needed. If changes are substantial, additional analysis will be required by the lead federal agency issuing the permit or authorization.

### **New Information**

The Draft EIS acknowledges that recent information has been made available by the Aleutians East Borough regarding the inability to operate the current hovercraft, which is essentially the No Action alternative in the Draft EIS. We believe that this information needs to be fully analyzed by the FWS and if the current status of no hovercraft service is determined to be the existing condition, then the Final EIS needs to identify in detail how residents and health care providers are currently addressing medical and safety emergencies.

### **Realty Information**

Although much of the analysis in the Draft EIS is focused on the "nestled" purpose and need of a transportation system, the primary action of the FWS is the exchange of lands (transfer to the State of Alaska and receipt of lands from the State of Alaska as well as a native corporation). Currently there is little detail regarding the state and corporation lands that are proposed for receipt by the FWS. It is clear that there is high interest and controversy regarding the tremendously high acreage being transferred from private and state ownership into federal ownership.

Because of this interest, as well as to adequately determine impacts, we believe it is incumbent upon the FWS to adequately describe these lands and their values. We recommend that a process to identify this information, similar to what was begun for the proposed Yukon Flats land exchange, be completed and disclosed to the public in the Final EIS.

### **Clean Water Act 404(b)(1) Analysis**

We have previously recommended that a draft 404(b)(1) analysis be included in the EIS in an attempt to determine whether the least environmentally damaging alternative (LEDPA) is included in the alternatives analyzed in the EIS. We recognize that without an identified applicant, proceeding with a 404(b)(1) analysis may be difficult. However, because of the variety of transportation systems and the

lack of detailed analysis under CWA 404(b)(1) , it may be that the LEDPA has not been included in the EIS. We strongly urge the FWS to develop a draft 404(b)(1) analysis for inclusion in the final EIS. The lack of identification of information to identify the LEDPA may necessitate additional NEPA analysis in the future by the U.S. Army Corps of Engineers and could result in the identification of another alternative as the LEDPA, which could be in conflict with the Secretary's decision.

At a minimum we urge the FWS to complete a site-verified wetland delineation for inclusion in the Final EIS to more fully assess impacts to wetlands and to support a future 404(b)(1) analysis.

**Compliance with Section 106 of the National Historic Preservation Act**

We recommend that FWS complete the required review for eligible historic properties under Section 106 of the National Historic Preservation Act and include the information from its determination in the Final EIS. Otherwise, similar to compliance with Section 404 of the Clean Water Act, the Section 106 determination may preclude the selection of all or part of certain alternatives and also force additional analysis under NEPA in the future.

We appreciate the opportunity to offer comments on the Draft EIS and look forward to continuing to work with the FWS on addressing the issues we have identified for the Final EIS. Please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov) or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

**King Cove Group**

*Agdaagux Tribe of King Cove & Belkofski Tribal Council*

*King Cove Corporation*

*City of King Cove & Aleutians East Borough*

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**Post Office Box 37**

**King Cove, Alaska 99612**

**907-497-2340 (phone) 907-497-2594 (fax)**

May 18, 2012

The Honorable Ken Salazar, Secretary  
U.S. Department of the Interior  
1849 C Street NW  
Washington, DC 20240

**RE: Comments on the Draft Environmental Impact Statement for the Izembek National Wildlife Refuge Land Exchange & Public Interest Finding**

Dear Secretary Salazar:

This letter, accompanying comments, and appendices are submitted by the King Cove Group (KCG)<sup>1</sup>. The KCG includes the Agdaagux Tribe of King Cove, Belkofski Tribal Council, King Cove Corporation, Aleutians East Borough, and the City of King Cove, Alaska. These groups have been working together for over 20 years to obtain a favorable, federal decision, which will permit the construction and operation of a road between the communities of King Cove and Cold Bay, Alaska. This road is absolutely critical to the health, safety, and quality of life for the 940 residents of King Cove. The majority of King Cove residents are Aleuts.

**Executive Summary**

The KCG supports and respectfully requests that you approve the land exchange authorized by Congress in Public Law (PL) 111-11, titled the Izembek National Wildlife Refuge Land Exchange. This exchange will provide 56,000+ acres of land owned by the State of Alaska and the King Cove Corporation in return for approximately 211-217 acres of federal lands located within the Izembek Wildlife Refuge as dictated by PL 111-11, and to which the Congress has delegated to you the final decision and public interest finding over whether this land exchange should be approved, executed and implemented.

The substantial majority of King Cove’s 940 residents are Aleuts. These residents and our ancestors have lived in the King Cove, Izembek, and Cold Bay areas for over 5000 years. We are

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<sup>1</sup> The King Cove Group has also used the group title of “Izembek EIS and Road Partnership Team” in prior letters to you and the U.S. Fish & Wildlife Service.

the original, aboriginal residents of the area and have continually occupied, hunted, fished, collected berries and lived in harmony with these lands and the abundant fish and wildlife which have shared these lands with us since time immemorial. We believe it is just and required that you determine that this land exchange is in the public interest.

This finding of public interest must be made for the following reasons:

1. Congress has already authorized this exchange subject to the completion of an Environmental Impact Statement under the National Environmental Policy Act and your finding of public interest.
2. The Aleut residents of King Cove have an individual and group trust relationship with the federal government for which you, as the Secretary of Interior, are responsible to implement. The approval of this land exchange is a vital requirement of properly carrying out this trust responsibility between the United States and the Aleut residents of King Cove and the other Alaska Natives, which have testified and submitted comments in support of this land exchange. This trust relationship has been recognized by the Department and Congress for many years and was recently reaffirmed by the passage of the Indian Health Care Improvement Act of 2011, which states in Section 3:

“Congress declares that it is the policy of this Nation, in fulfillment of its special trust responsibilities and legal obligations to Indians to:

(1) ensure the *highest possible health status for Indians* and urban Indians and *to provide all resources necessary to effect that policy*; and,

(2) raise the health status of Indians and urban Indians to at least the levels set forth in the goals contained within the Healthy People 2010 initiative or successor objectives (*emphasis added*).”

3. As part of this trust relationship, the Aleut residents of King Cove have a vital interest and need for a safe, reliable, and affordable transportation system which will allow them to travel from King Cove to the Cold Bay Airport to access regular scheduled or medevac charter air transportation from Alaska’s third largest airport. The Cold Bay Airport has paved runways and daily (24 hour availability), year round operations to Anchorage, other locations in Alaska, and the lower 48.
4. Please note the following information per the matter of accessible and dependable air service for King Cove and surrounding communities, which depend upon the Cold Bay Airport.

As part of the public DEIS meetings, USFWS had face-to-face meetings scheduled to occur in Nelson Lagoon and False Pass on May 9, 2012. Due to weather and non-flyable conditions by USFWS pilot guidelines, these meetings had to be rescheduled as a teleconference from King Cove later that day. This information is highlighted as a typical occurrence (25-40% of the time) in explaining the difficulty of relying on small aircraft for regular and emergency transportation from King Cove and the other adjacent villages to the Cold Bay Airport.

5. The public interest will be fully and positively served by the addition of 56,000+ acres of State and Alaska Native Corporation land which will add and enhance prime wildlife habitat, wilderness, resident and migratory fish and wildlife, recreational, and wetlands values. The lands being added to the Izembek and Alaska Peninsula Wildlife Refuges will permanently become part of the refuges' wilderness and non-wilderness areas. The addition of these lands will be completing key objectives for both refuges as identified in their respective comprehensive conservation plans. These designations will perpetually preserve these lands from any threat of development or management on these State and private lands, which might be inconsistent with these conservation plans.
6. Most importantly, the decision to approve the land exchange in the public interest will serve the public interest by rectifying nearly 50 years of the federal government ignoring the rights and needs of the Aleut people and other residents of King Cove. These rights and needs have been ignored and disrespected by the federal government's failure to consult and consider their needs when making decisions which critically affect their health, safety and quality of life.

These decisions included the creation of the Izembek National Wildlife Refuge in 1960 and 1980 Alaska National Lands Interest Conservation Act, which designated about 300,000 acres of the Izembek National Refuge as wilderness. As a result of these decisions, agents of the federal government excluded the predominantly Aleut residents of King Cove and the-then community of Belkofski<sup>2</sup> from continuing their ancestral, current and cultural use of refuge areas by burning down their subsistence cabins. These actions were in direct violation of Congressional established policy and without consultation with the King Cove and Belkofski tribal residents and thereby endangering

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<sup>2</sup> Belkofski is a former Aleut community located about 25 miles east of King Cove. Belkofski was settled in 1823 as a Russian-American fur trading center. In 1880, Belkofski had 260 residents. However, federal government changes in fur sealing regulations significantly impacted the residents' economic ability to sustain their families and community, and consequently these residents abandoned their community and moved to King Cove. These Aleuts, like the Aleuts living in King Cove, have been traversing the Izembek area and harvesting a variety of resources for over 4,000 years.

the health, safety, and quality of life of these residents who subsisted on the lands encompassed by these refuges, and whose ancestors lived and subsisted on these lands since time immemorial.

The KCG urges and requests the Secretary to choose either Alternative 2 or 3 as presented in the Draft Environmental Impact Statement (DEIS). There are good reasons to choose either of these two alternatives as described in the DEIS and in our comments attached to this letter. The KGC does not recommend a preference for either alternative. However, it is critical that one of these two alternatives be selected. Only a decision of one of these two alternatives can change the lives of the Aleut and other residents of King Cove and assure us to have a safe, reliable, and affordable transportation alternative as provided in the Izembek Land Exchange legislation and as required by your trust relationship with our people.

The KCG respectfully submits this letter, DEIS comments and appendices to demonstrate that a selection of either Alternative 2 or 3 is in the public interest. We also respectfully request that you make your decision that either Alternative 2 or 3 is in the public interest.

### **Public Interest finding**

Congress did not provide a definition of the public interest to guide the Secretary of Interior in consideration of the decision as to whether the selection of either Alternative 2 or 3 analyzed in the DEIS is in the public interest. By this letter, the KCG respectfully suggests factors which must be considered by you in your decision.

1. The public interest of the most affected people by this decision are clearly the residents of the City of King Cove, where the vast majority of residents are Aleuts and with whom the federal government has a direct trust relationship under federal law. The decision to select either Alternative 2 or 3 is clearly in the interest of these residents. The DEIS clearly shows that only, and either one of these two alternatives, can meet the purpose and need of the DEIS, as well as meet the purpose and need of the King Cove residents for safe, dependable, and affordable transportation. By selecting one of these alternatives, the public interest represented by the Aleuts and other residents of King Cove is fulfilled.
2. The interests of the fish and wildlife affected are clearly enhanced by the land exchange and road construction. Our attached comments demonstrate that the addition of the 54,300 acres of King Cove Corporation and State of Alaska land add great values to the overall resources and management of the Izembek and Alaska Peninsula Refuges. Since these lands will become permanently part of the refuges and wilderness areas, as designated by PL 111-11 once the land exchange is implemented, the overall fish and

wildlife values of the refuges will be greatly enhanced and the public interest in protecting these values is served.

3. Other values such as wilderness, wetlands, air quality, water quality, endangered species, and habitat are also enhanced by the very large amount of positive values added to the two refuges. These additional values far outweigh any negligible or minor effects from the conveyance of the small amount of acreage (211-217 acres) necessary for the construction and operation of the road between King Cove and Cold Bay. The public interest is thereby enhanced and the land exchange is in the public interest.
4. Honoring the trust relationship between the federal government and the Aleut people of King Cove is clearly enhanced by the land exchange. Years of federal acts ignoring the needs of the Aleut people which included federal agents purposely burning cabins of Aleut subsistence hunters and the failure of the federal government to contact or consult the Aleut people when the refuges and wilderness were created is ameliorated by a decision to find that the land exchange is in the public interest. Congress clearly recognized this in the passage of PL 111-11 when it set this EIS and decision making process in motion. The Congress has demonstrated its fealty to the trust relationship between Alaska Natives and tribes time and again.
5. The Indian Health Care Improvement Act (ICHA) is a profound demonstration of the Congress' purpose and direction to insure that the Aleut residents of King Cove have "the highest possible health status for Indians and urban Indians and to provide all resources necessary to effect that policy." The clearest and easiest way to implement this policy for the Aleut residents of King Cove is to approve the land exchange in Alternative 2 or 3 as in the public interest. This will insure that once the road is constructed, the Aleuts residents of King Cove will have the highest possible health status by being assured of reaching the all-weather airport at Cold Bay which will allow them on an emergency and regular basis to obtain healthcare at the Alaska Native Medical Health Center and other medical facilities in Anchorage or elsewhere in the lower 48.

Currently, King Cove Aleuts are at the whim of weather as to when, or if, they can receive this care on a timely and dependable basis. Thus, as expressed in federal law, the public interest is clearly served with this highest level of health and medical services.

6. The interests of the State of Alaska are served by a decision to approve the land exchange and road construction and operation. On August 10, 2010, Governor Sean Parnell signed into law HB 210 which publicly declared the support of the State of Alaska

for this land exchange and road construction. This bill was unanimously passed by a 60-0 vote by the Alaska Legislature and included the approval required by PL 111-11 that the State support and agree to the land exchange and designate the state-owned, submerged lands of the Izembek Lagoon as an Alaska State Game Refuge. In this case, the federal and state legislatures are in agreement that this land exchange should be completed, subject only to your approval and that the approval of this exchange and subsequent road construction are in the public interest.

7. Settling this issue in consideration of the public, federal, state, and local support for this exchange to be implemented is in the public interest. The Aleut people of King Cove, all tribes in the region, the Alaska Federation of Natives and the National Conference of American Indians fully support this exchange. Also, the local governments of King Cove and the Aleutians East Borough fully support this land exchange and road construction and operation. All governmental bodies in the State of Alaska which have expressed an opinion are in favor, and their part of the public interest is advanced by approval of the land exchange.
8. The only opponents to this land exchange appear to be national environmental organizations, which are opposed for their own reasons. While these groups and members will undoubtedly submit comments in opposition, the KGC believes these comments will either not be substantive or misinformed. For example, at the recent public meeting on the DEIS held by the US Fish and Wildlife Service in Anchorage, a representative of the Audubon Alaska testified no road was needed because the King Cove clinic had been improved and that a health and medical danger was not that great.

This is a cruel and uninformed misunderstanding of the situation in King Cove. The weather situation is so dire and threatening, that there are medevacs each month regardless of the season, which put the lives of the sick or injured person, their family, and the medical responders in jeopardy.

These are documented and are part of the record. This statement by the Anchorage based representative of Audubon Alaska is off the mark and cruelly insensitive. It is easy to sit in Anchorage and talk about the lack of emergency needs of rural Aleuts in King Cove. That person needs only get in a car and drive to one of Anchorage's terrific hospitals for his/her medical problem. The King Cove Clinic is defined by the US Department of Health and Human Services as a medically underserved facility which can only stabilize sick and/or trauma victims for transfer by an often dangerous and unpredictable medevac service, via a plane or 3-hour boat ride to Cold Bay in order to get to Anchorage.

Any attempt to minimize the current situation as either already fixed or a “solution in search of a problem” is misguided or intentionally cruel. These advocacy groups have little regard for the problems of Alaska’s rural people, like the Aleut residents of King Cove. For example, the National Wildlife Refuge Association website still states that the hovercraft, which has been suspended permanently by the Aleutian East Borough, is still in operation. This misinforms the public on the status of the hovercraft and may lead to confusion and misinformed comments based on this misinformation.

8. Congress has provided many statutory safeguards to insure that this road will be properly regulated. In fact, it is likely that this road, if approved and constructed, will be one of the most, if not the most, highly regulated roads in the entire federal government’s refuge system. The road is prohibited by statute from being used for commercial purposes. There will be no trucks hauling freight on this road as there are in National Wildlife Refuges throughout the lower 48 states and in Alaska, such as through the Kenai National Wildlife Refuge. The road will be for personal use only to reach the Cold Bay Airport.

There are only a combined total of about two hundred cars in King Cove and Cold Bay. Less than 35 cars a day are anticipated to use the road. This situation will be completely unlike federal refuges in the lower 48, like the Blackwater National Wildlife Refuge on the Eastern Shore of Maryland. This refuge is accessible from any place in North or Central America which is connected by road to US Route 50, one of America’s best known roads connecting San Francisco, California to Ocean City, Maryland and which delivers visitors within a few miles of the refuge.

In fact, the USFWS website for this refuge promotes a paved “Wildlife Drive” described on its website:

“Wildlife Drive - Blackwater National Wildlife Refuge features a Wildlife Drive consisting of a six and a half mile loop or three and a half mile drive of all-weather road that winds along fresh water ponds, through woods, and past fields and marsh. Walking and cycling on the Wildlife Drive is permitted. Two foot trails and a photo blind can be found on the Drive. Two new longer foot trails are now open in other areas of the refuge. Over 20 miles of canoe/kayak trails in the Blackwater River will take you through seldom-seen areas of the refuge. The county roads encircling the Refuge are suitable for longer car or cycling tours. “

The Izembek road will be completely isolated with no connection to any other place in Alaska, Canada, or the lower 48. No parking on the road will be permitted and it will be only a one lane, gravel road as required by statute. Once built, the single-lane gravel road will solve a long time health, safety, and quality of life problem for the Aleut residents of King Cove with no substantive affect on the Izembek Refuge.

The Aleut and other residents of King Cove need and deserve a dependable and permanent solution to their problem of safe, reliable, and affordable transportation from King Cove to the Cold Bay Airport. Past testimony and public records clearly indicate how dangerous and unpredictable it is flying to and from the King Cove gravel airstrip to the modern Cold Bay Airport. The notoriously and constantly changing weather of this area, combined with the precarious topography of the King Cove airstrip, are the reasons for the highly unpredictable, nerve-wracking, and sometimes fatal flights between King Cove and Cold Bay.

Since 1980, 11 people have died flying between King Cove and Cold Bay. Additionally, the lives of hundreds of Aleuts and other residents of King Cove continue to be severely impacted because of this very precarious situation. We implore you, Secretary Salazar, to help change this situation.

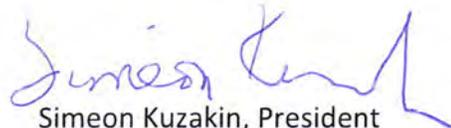
The DEIS shows that the only viable solution to serve the public interest is the approval of this land exchange. By submission of this letter, including our detailed DEIS comments and appendices, and combined with thousands of hours of testimony and comments and hundreds of thousands of dollars spent by all of the Aleut people of King Cove and their supporters, the KCG respectfully urges and requests that you, Secretary Salazar, approve the Izembek land exchange.

Thank you

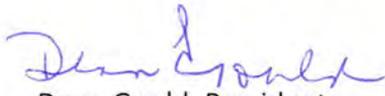
Sincerely,



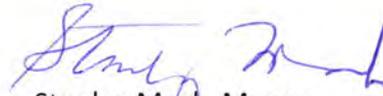
Dale Gould, President  
Agdaagux Tribe of King Cove



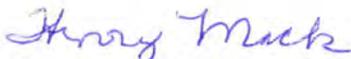
Simeon Kuzakin, President  
Belkofski Tribal Council



Dean Gould, President  
King Cove Corporation



Stanley Mack, Mayor  
Aleutians East Borough



Henry Mack, Mayor  
City of King Cove

CC: Governor Sean Parnell  
Senator Lisa Murkowski  
Senator Mark Begich  
Congressman Don Young  
Kim Elton, Alaska Special Assistant to Secretary Salazar  
Dan Ashe, USFWS, National Director  
Geoffrey Haskett, USFWS, Regional Director – Alaska Region

- Attachments:
- 1) King Cove Group (KCG) Consolidated Comments, Conclusions and Recommendations on the Izembek National Wildlife Refuge Land Exchange/Road Corridor DEIS (DOI DES 12-8) Prepared by the USFWS.
  - 2) Table 2. KCG Summary of Key Issues and Overall Beneficial, Negative, or No Effect Conclusions for Alternatives 1, 2, and 3, with Reference to Alternatives 4 and 5.
  - 3) “King Cove’s Need for a Road to the Cold Bay Airport” January 2011 by Gary Hennigh, City Manager, City of King Cove, Alaska.
  - 4) Final Report. “Review of Impact Assessments for Terrestrial Wildlife in the Izembek National Wildlife Refuge Land Exchange/Road Corridor DEIS (ABR, Inc. – Environmental Research & Services; May 16, 2012)
  - 5) Photos
  - 6) Selected KCG DEIS Page Comments

**KING COVE GROUP (KCG) CONSOLIDATED COMMENTS , CONCLUSIONS AND  
RECOMMENDATIONS ON THE IZEMBEK NATIONAL WILDLIFE REFUGE LAND EXCHANGE/ROAD  
CORRIDOR DRAFT ENVIRONMENTAL IMPACT STATEMENT (DOI DES 12-8) PREPARED BY THE  
U.S. FISH & WILDLIFE SERVICE (MARCH 2012)**

*Our Roots Are Deep*

*Archaeologists have located human remains that suggest that the indigenous people of this region, we call ourselves Unangan, have history that dates back 4000 years.*

*Izembek got its name from a Russian count, one of many Russian traders to invade the coastline in the late 1800s, with voracious appetites for sea otter pelts. Indigenous people were enslaved to feed those appetites.*

*Unable to say Unangan, we were renamed Aleuts.*

*The modern community of King Cove traces its origins to the late 1800s with the arrival of English immigrant Robert King who married a local woman and moved to the Cove to make a home for his family. Of the 10 founding families, 5 were comprised of a European husband and Aleut wife.*

*The present structure of the community and its economy extends back to 1911 when Pacific American Fisheries built a salmon cannery and members of Aleut and Yupik tribes came to find work.*

**May 18, 2012**

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## ATTACHMENTS

1. Table 3. KCG Summary of Key Issues and Overall Beneficial, Negative, or No Effect Conclusions for Alternatives 1, 2, and 3 with Reference to Alternatives 4 and 5
2. *"King Cove's Need for a Road to the Cold Bay Airport"* January 2011 by Gary Hennigh, City Manager, City of King Cove Alaska.
3. *"Review of Impact Assessments for Terrestrial Wildlife in the Izembek National Wildlife Refuge Land Exchange/Road Corridor DEIS"* 16 May 2012
4. Photos
5. Selected KCG DEIS Page Comments

## INTRODUCTION

Public Law 111-11, Title VI, Subtitle E (Subtitle E) authorizes a land exchange for the purpose of constructing, operating and maintaining a single lane gravel road across a portion of the Izembek National Wildlife Refuge including the Izembek National Wildlife Refuge Wilderness (Izembek Wilderness) providing an Environmental Impact Statement (EIS) is completed and the Secretary of the Interior determines the land exchange is in the public interest. The land exchange involves surface and subsurface ownership of the Federal Government and the State of Alaska and surface ownership of the King Cove Corporation, an Alaskan Native Corporation formed under the provisions of the Alaska Native Claims Settlement Act (ANCSA). The Congress determined this need was so great that it authorized the removal of a limited amount of land from the Izembek Wilderness and established a land exchange that was mutually agreed to by the King Cove Corporation, the State of Alaska, and most importantly the U.S Fish and Wildlife Service (Service) and the Department of the Interior.

Authorization for the land exchange expires 7 years from the date President Obama signed Public Law 111-11 on March 30, 2009. Subtitle provides for extension of the 7 year authorization in the event of an administrative appeal or for litigation. In the meantime the residents, workers, and visitors to the City of King Cove will continue to lack a safe, reliable, and affordable means to travel to and from the Cold Bay Airport and the outside world.

The Federal Government will relinquish fee title ownership to 1,619 acres comprising an abandoned U.S. Coast Guard Station that is an inholding on the State owned Sitkinak Island and fee title surface and subsurface ownership of either 201 or 227 acres and an additional 35 acres of subsurface ownership to the State of Alaska. The State of Alaska will relinquish fee title surface and subsurface ownership to 41,887 acres. The King Cove Corporation will relinquish surface ownership of 10,696 acres to the Federal Government and priority selection rights to 5,430 acres in the Izembek Wilderness in return for a safe, reliable, and affordable road connecting the City of King Cove to the Cold Bay Airport. Also included is the right of the King Cove Corporation to select 5,430 acres of replacement land of lesser value non-wilderness Federal ownership in the Alaska Peninsula National Wildlife Refuge. Ownerships and resources are not identified for the Blinn Lake parcel that will be administratively transferred from the Alaska Peninsula National Wildlife Refuge to the Izembek National Wildlife Refuge. In total, The FEIS (FEIS) needs to disclose the resources and effects of more than 69,600 acres where there are potential ownership changes as a direct result of Alternative 2 or Alternative 3 under the provisions of Subtitle E.

There are five attachments that are part of these KCG comments. In addition, the KCG provided extensive comments to the Service on December 23, 2011 that are not reflected in the DEIS. Accordingly, the KCG comments on the PDEIS also are incorporated for Service consideration as the FEIS is prepared.

Table 1. Summary of Potential Land Ownership Changes for each Alternative to Provide Safe, Reliable, and Affordable Transportation between the City of King Cove and the Cold Bay Airport <sup>a</sup>

PARCEL	NO LAND EXCHANGE WITH CONCEPTUAL PASSENGER CARRYING LANDING CRAFT (ALTERNATIVE 1)	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR (ALTERNATIVE 2)	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR (ALTERNATIVE 3)	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT (ALTERNATIVE 4)	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY BETWEEN LENARD HARBOR AND COLD BAY DOCK (ALTERNATIVE 5)
Sitkinak Island (Federal to State)	None	1,619 acres	1,619 acres	None	None
State	None	41,887 acres	41,887 acres	None	None
Mortensens Lagoon (King Cove Corporation to Federal)	None	8,092 acres	8,092 acres	None	None
Kinzarof Lagoon (King Cove Corporation to Federal)	None	2,604 acres	2,604 acres	None	None
Kinzarof Lagoon (State water to Izembek State Game Refuge)	None	4,282 acres	4,282 acres	None	None
King Cove Corporation Relinquishment (Remains Federal)	5,430 acres	5,430 acres	5,430 acres	5,430 acres	5,430 acres
King Cove Corporation Replacement Land	None	5,430 acres	5,430 acres	None	None
Southern Road Corridor (Federal to State)	None	236 acres	None	None	None
Northern Road Corridor (Federal to State)	None	None	262 acres	None	None
Blinn Lake (Administrative transfer from Alaska Peninsula to Izembek National Wildlife Refuge)-	None	Not Identified	Not Identified	None	None
<b>TOTALS</b>	<b>5,430 ACRES</b>	<b>MORE THAN</b>	<b>MORE THAN</b>	<b>5,430 ACRES</b>	<b>5,430 ACRES</b>

		<b>69,576 ACRES</b>	<b>69,606 ACRES</b>		
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NOTE: THE ACREAGE OF THE BLINN LAKE PARCEL THAT WILL BE ADMINISTRATIVELY TRANSFERRED TO THE IZEMBEK NATIONAL WILDLIFE REFUGE IS NOT INCLUDED SINCE THE DEIS DOES NOT IDENTIFY THE ACREAGE OR OWNERSHIP.

<sup>a</sup> ACREAGES OF STATE, FEDERAL AND KING COVE CORPORATION OWNERSHIPS ARE BASED ON INFORMATION IN THE DEIS, APPENDIX B. ACREAGES OF THE KINZAROF LAGOON ADDED TO THE IZEMBEK STATE GAME REFUGE ARE FROM M. FINK, (ADF&G).

Table 2. Summary of Potential Net Land Ownership Changes for each Alternative to Provide Safe, Reliable, and Affordable Transportation between the City of King Cove and the Cold Bay Airport

<b>OWNERSHIP</b>	<b>NO LAND EXCHANGE WITH CONCEPTUAL PASSENGER CARRYING LANDING CRAFT  (ALTERNATIVE 1)</b>	<b>LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR  (ALTERNATIVE 2)</b>	<b>LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR  (ALTERNATIVE 3)</b>	<b>NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT  (ALTERNATIVE 4)</b>	<b>NO LAND EXCHANGE WITH A CONCEPTUAL FERRY BETWEEN LENARD HARBOR AND COLD BAY DOCK  (ALTERNATIVE 5)</b>
<b>NET CHANGE IN LAND OWNERSHIP</b>					
<b>NATIONAL WILDLIFE REFUGE</b>	-5,430 SURFACE ACRES	+50,763 SURFACE ACRES +40,032 SUBSURFACE ACRES	+50,737 SURFACE ACRES +40,006 SUBSURFACE ACRES	-5,430 SURFACE ACRES	-5,430 SURFACE ACRES
<b>STATE</b>	NONE	-40,067 SURFACE ACRES -40,032 SUBSURFACE ACRES	-40,041 SURFACE ACRES -40,006 SUBSURFACE ACRES	NONE	NONE
<b>KING COVE CORPORATION</b>	+5,430 SURFACE ACRES	-16,126 SURFACE ACRES	-16,126 SURFACE ACRES	+5,430 SURFACE ACRES	+5,430 SURFACE ACRES
<b>IZEMBEK STATE GAME REFUGE</b>	NONE	+4,282 SURFACE ACRES +4,282 SUBSURFACE ACRES	+4,282 SURFACE ACRES +4,282 SUBSURFACE ACRES	NONE	NONE



## KCG OVERARCHING COMMENTS

**THE KCG CONCLUDES, AS SHOWN IN OUR COMMENTS, THERE GENERALLY ARE ADEQUATE AVAILABLE INFORMATION IN THE DEIS –**

- 1. TO CLEARLY IDENTIFY THE PHYSICAL, BIOLOGICAL, AND SOCIOECONOMIC EFFECTS OF THE LAND EXCHANGE AND CONSTRUCTION OF A SINGLE LANE GRAVEL ROAD IN EITHER THE SOUTHERN OR CENTRAL ROAD CORRIDOR.**
- 2. TO CLEARLY IDENTIFY THE RELATIVE ACREAGES AND VALUES OF THE SLIGHTLY LESS THAN 64,200 ACRES OF LAND AND RESOURCES DIRECTLY ASSOCIATED WITH THE LAND EXCHANGE.**
- 3. TO CLEARLY IDENTIFY THE SCOPE AND INTENT OF THE ENFORCEABLE MITIGATION PLAN AS CONTEMPLATED IN P.L. 111-11, SUBTITLE E**
- 4. TO CLEARLY PROVIDE SUFFICIENT INFORMATION FOR THE SECRETARY OF THE INTERIOR TO DETERMINE THE PUBLIC INTEREST IN CONSUMMATING THE LAND EXCHANGE AUTHORIZED BY SUBTITLE E.**

The DEIS assumes a hovercraft is available for operation on the waters of Cold Bay. The Service was informed on November 15, 2011 by the AEB that its hovercraft service was terminated and the DEIS notes the FEIS will recognize the fact that the AEB hovercraft is not and will not operate on Cold Bay because it is neither cost effective with an annual subsidy cost of at least \$1,000,000 and an estimated annual operating cost of more than \$2,000,000 under Alternative 4 nor reliable.

### RECOMMENDATIONS

**THE KCG RECOMMENDED ON DECEMBER 23, 2011, THE DEIS SHOULD REMOVE THE ASSUMPTION THERE WILL BE A HOVERCRAFT OPERATING UNDER THE NO LAND EXCHANGE-NO ROAD ALTERNATIVE**

- 1. THE SERVICE INCLUDED A NOTATION THAT THIS RECOMMENDATION WILL BE INCORPORATED WHEN THE FEIS IS PREPARED.**
- 2. THE COST OF A NEW, REPLACEMENT HOVERCRAFT FOR THE NO LAND EXCHANGE WITH HOVERCRAFT SERVICE (ALTERNATIVE 4) INCLUDE AN ESTIMATED COST OF AT LEAST \$9,000,000 SINCE THE DEIS ECONOMIC ANALYSIS ASSUMES THE AEB HOVERCRAFT WILL BE AVAILABLE.**

The land exchange authorized by Subtitle E involves the potential construction of a 19 -22 mile long single lane gravel road to provide safe, reliable and affordable transportation between the City of King Cove and the Cold Bay Airport. The road will result in the removal of up to 152 acres of the Izembek Wilderness, fill up to 3.8 acres of wetlands, and potentially disturb up to a combined 2.5 pairs and nests of Tundra Swans within 1,500 meters of the road. In return Subtitle E would add almost 49,800 acres of unique new Izembek and Alaska Peninsula Refuge Wilderness, an additional almost 13,600 acres of wetlands to Refuge and Wilderness status plus another 4,300 acres of State waters and submerged land with 2,300 acres of eelgrass habitat and 17 miles of intertidal shoreline to the Izembek State Game

Refuge, and more than 35,200 acres of Tundra Swan habitat to the Refuge and Wilderness systems. The Service notes "...the EIS must address the quality and value of habitat and the function and value of wetlands as part of the evaluation of impacts to the physical, biological, and social environment including wilderness character." (DEIS p. 1-9) The DEIS consistently ignores the function and value of habitat of the 4,300 acres of State water and submerged land including 17 miles of intertidal shoreline and 2,300 acres of eelgrass habitat that will be added to the Izembek State Game Refuge and managed like State waters, submerged land, eelgrass habitat and intertidal shoreline that comprise the Izembek Lagoon and Moffet Lagoon (Izembek Lagoon Complex). Except for wetlands, the the DEIS does not describe the resources associated with the other land exchange parcels whichlack a consistent description of acres of habitat that allows a relative comparison with the same resource described in detail for the two road corridors. To assist the Service prepare the FEIS, the KCG has included summary tables describing the major components of the Purpose and Need, Land Ownerships, Subsistence, Wetlands, Wilderness, Steller's Eider, Kittlitz's Murrelets, Northern Sea Otter, Tundra Swan, Caribou, and Brown Bear. Unless otherwise noted, these data are derived directly from information contained in the DEIS.

#### RECOMMENDATIONS

##### THE KCG RECOMMENDS THE FEIS --

- **3. CLEARLY AND CONSISTENTLY IDENTIFY THE NET EFFECTS OF BOTH ROAD ALTERNATIVES TO EMPEROR GOOSE AND BRANT, STELLER'S EIDER, AND NORTHERN SEA OTTER BY ADDING STATE OWNERSHIP OF 4,300 ACRES OF WATER AND SUBMERGED LAND COMPRISING KINZAROF LAGOON WITH ITS 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE ADDED TO THE IZEMBEEK STATE GAME REFUGE.**

Most impact analyses in the DEIS only address effects at the local level, specifically the 201 acres in the Southern Road Corridor and the 227 acres of Federal ownership in the Central Road Corridor in Alternative 2 and 3, respectively and adjoining resources. The DEIS sometimes addresses generic effect on adjacent land and habitat but does not consistently address the resources and habitats that will be added to the National Wildlife Refuge System and the National Wilderness Preservation System.

A prime example where the FEIS needs to have a scientific basis for the evaluation of effects for each Alternative is for Tundra Swans. The Service unilaterally concluded the effect of both road alternatives will have a "major effect" on Tundra Swans. Up to that point the KCG had generally relied on the Service to reach conclusion about fish and wildlife effects after a careful and scientific analysis of available data. However, the DEIS discusses Tundra Swan observations with a generic assertion that the road "crosses" high density Tundra Swan habitat with "numerous" observations of pairs and nests in close proximity. The number and location of swan pairs and nests were not disclosed even though the Service 1998 Land Protection Plan for the Izembek refuge complex shows nest sites. Accordingly, the City of King Cove requested the Service to provide the 26 years of Tundra Swan observations and contracted with ABR, Inc--Environmental Research & Services (ABR) to evaluate the Tundra Swan and

other wildlife conclusions presented in the DEIS. ABR merged the Service Tundra Swan data with the Service GIS data base showing the centerline of both the Southern Road Corridor and the Central Road Corridor. A scientific analysis of these two Service data sets shows the Service clearly reached an effects conclusion for Tundra Swan in the DEIS that is not supported by its own data. See Attachment 1 for the ABR report "*Review of Impact Assessments for Terrestrial Wildlife in the Izembek National Wildlife Refuge Land Exchange/Road Corridor DEIS*" May 2012. It is noted the DEIS references previous work done by ABR on the effect of road traffic on birds in relation to important bird habitats in Kinzarof Lagoon. The ABR evaluation uses the same 800 meter and 1,500 meter buffers in previous studies. The KCG has carefully reviewed the ABR report and fully incorporates those findings in the KCG comments herein.

#### RECOMMENDATIONS

##### THE KCG RECOMMENDS --

- **4. THE FEIS INCLUDE AN UNBIASED, SCIENTIFIC REVIEW OF THE 26 YEARS OF SERVICE DATA ON TUNDRA SWAN PAIRS AND NESTS FOR THE TWO ROAD CORRIDORS AND FOR THE 31,200 ACRES OF UNIQUE TUNDRA SWAN HABITAT, SWAN PAIRS AND NESTS THAT WILL BE TRANSFERRED TO THE FEDERAL GOVERNMENT FOR MANAGEMENT AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM (27,100 ACRES) AND THE NATIONAL WILDLIFE REFUGE SYSTEM. (SEE THE DISCUSSION FOR TUNDRA SWANS FOR SPECIFIC RECOMMENDATIONS.)**

The effects analysis does not consistently apply the recommended mitigations to determine the net result of the reasonably foreseeable effect. For example many of the resource assessments include increased hunting as an implied negative effect without indicating whether the anticipated hunting is actually an increase of projected hunting pressure or simply a redistribution of future hunting pressure. The regulatory authority of the Service to assure hunting harvest levels are consistent with the terms of the Migratory Bird Treaty Act is not discussed. The basis for the assumption there will be an unquantified but "substantial" illegal use of motorized vehicle travel into the adjacent Wilderness is unexplained and unsubstantiated and needs further discussion in the FEIS about the probability of substantial illegal motorized travel in the Wilderness since the bollard-chain barriers on both sides of the road are specifically required by Subtitle E as an engineering design element to prevent illegal use of motorized travel and associated uses such as increased hunting pressure. In some cases the probability of an event such as deflecting caribou migration is included in the effects assessment. In others, such as fish, the probability of overharvesting fish is identified as a "major" effect without evaluating the fact that a person starting from the City of Cold Bay will need to travel at least 20 miles and bypass excellent fishing resources before reaching one of the fish streams of concern. A person starting from the City of King Cove will need to travel more than 25 miles to reach one of the streams of concern and in doing so has by passed a number of excellent fishing areas on King Cove Lagoon and all the anadromous fish streams crossed between the City and the northeast corner of Cold Bay.

**RECOMMENDATIONS****THE KCG RECOMMENDS THE FEIS IDENTIFICATION OF THE DIRECT, INDIRECT, AND CUMULATIVE EFFECTS --**

- **5. BE BASED ON THE ANTICIPATED EFFECT WITH THE REQUIRED ROAD DESIGN STANDARDS AND ADDITIONAL RECOMMENDED MITIGATION MEASURES.**
- **6. INCLUDE AN ANALYSIS OF THE PROBABILITY OF IMPLIED NEGATIVE EFFECTS SUCH AS HUNTING OVERHARVEST, OR FOR ILLEGAL USE OF MOTORIZED VEHICLES IN THE WILDERNESS, OR FOR OVERHARVESTING FISH INCLUDING WHETHER FEDERAL OR STATE REGULATORY MECHANISMS ARE INSUFFICIENT OR SUFFICIENT TO HANDLE ANY POTENTIAL INCREASE IN HUNTING AND FISHING PRESSURE.**

Use of the term "unique" e.g., *the affected resource is protected by legislation and the affected resource fills a unique ecosystem role within the locality or region*, should be applied equally to all the resources on all the Parcels in the proposed land exchange, as well as the Blinn Lake Parcel, and Kinzarof Lagoon addition to the Izembek State Game Refuge. For example fish streams crossed by the Southern or Central Road Corridors are "unique" because they are located in Wilderness. The same "uniqueness" is not considered for the salmon streams located in the areas that are added to or retained in the National Wilderness Preservation System. The anadromous fish streams crossed by the Southern Road Corridor or the Central Road Corridor are "unique" because they would be removed from the Izembek Wilderness. Anadromous fish streams located in the Mortensens Lagoon Parcel should also be considered "unique" since they will become part of the Alaska Peninsula National Wildlife Refuge.

DEIS Tables 4-1, 4-2, and 4-3 describe the definitions and criteria for the effects evaluations. These are not always clear on the thresholds that move an effect from negligible, minor, moderate, or major. The DEIS refers to injury and mortality associated with road traffic, but there is no category for injury or mortality for road traffic. The distinction between an animal "departing" the area from those that "move away" is not clear or explained. The geographic criteria for a local or a regional effect needs to be to be consistently applied to all the Alternatives.

**RECOMMENDATIONS****THE KCG RECOMMENDS --**

- **7. THE SERVICE RE-EXAMINE THE DEFINITIONS AND THRESHOLDS FOR THE EFFECTS IN DEIS TABLES 4-1, 4-2, AND 4-3 FOR CLARITY ON WHEN AN EFFECT MOVES FROM NEGLIGIBLE, TO MINOR, TO MODERATE, TO MAJOR.**
- **8. THE SERVICE CONSULT WITH THE CORPS AND THE STATE TO ASSURE THE EFFECT CONCLUSIONS AND MITIGATIONS TO REDUCE OR ELIMINATE NEGATIVE EFFECTS ARE ONES THAT CAN BE CARRIED FORWARD INTO THE FEIS, RECORD OF DECISION, AND THE ENFORCEABLE MITIGATIONS THAT ARE INCORPORATED IN THE SECRETARY OF THE INTERIOR PUBLIC INTEREST FINDING.**

The DEIS considers the cumulative impact assessment to include reasonable foreseeable projects that may occur in the next 5 to 10 years. This period is often a reasonable period to evaluate the cumulative effects in an EIS. The change of land ownership will be permanent with those lands added to or retained as part of the National Wilderness Preservation System having the most restrictive land use. For example, the State has considered an oil and gas leasing program for land in the State Parcel. Adding these lands to the National Wilderness Preservation System will forever foreclose any energy related facility to be constructed on those lands. Considering a 5 to 10 year time line is not adequate for what may or may not happen on private lands owned by the King Cove Corporation ownership under Alternatives 1, 4, and 5. The FEIS needs to re-examine the history of land use in the area that has ranged from a land use focused on subsistence to a very large military base to future potential for existing ownerships to serve future commercial recreation services. For example it was only March 30, 2009 that the possibility of a road between the City of King Cove and Cold Bay became a reality. Likewise, the operational cost and reliability of a hovercraft operation rose from an estimated subsidy cost to the AEB of \$460,000 in the Corps 2003 EIS to approximately \$1,000,000 with a 6 day a week all year schedule costing more than \$2,000,000 as Alternative 4 that will now serve only 50 percent of the estimated demand in 2003. A road alignment to both sides of the mouth of Kinzarof Lagoon was identified in the Corps 2003 EIS. Although not considered in this EIS, the alignment could well serve some future commercial enterprise located on the peninsula between Cold Bay and Kinzarof Lagoon. There is no demand for this type of facility today, but it is only ruled out in the future if the Kinzarof Lagoon Parcel is added the Izembek Wilderness as part of the land exchange under Alternative 2 or Alternative 3. Similarly, the State has considered a leasing program for potential oil and gas resources that may be located on the State Parcel that will become Wilderness under Alternative 2 and Alternative 3 and as Wilderness no onshore petroleum exploration, production, or transportation facilities will be allowed. Reasonably foreseeable direct, indirect, or cumulative effects of oil and gas leasing on the State Parcel or adjacent off-shore State ownership are not addressed in the DEIS. The KCG has consistently pointed out these issues, most recently on December 23, 2011.

Subtitle E contemplates the timely completion of an Environmental Impact Statement (FEIS), Record of Decision, and public interest determination by the Secretary of the Interior. The EIS was to be initiated within 60 days after the date the State and the King Cove Corporation notified the Secretary of the Interior of their intentions to proceed with the land exchange. On August 6, 2009 the Service published notice in the Federal Register that an EIS was being started. The Scoping ended on May 31, 2010. Comments on the Draft Environmental Impact Statement (DEIS) is scheduled to end on May 18, 2012.

The DEIS effects analysis, except for a few instances does not consider the overall effect of resources that will be added to the National Wilderness Preservation System and the National Wildlife Refuge System. The KCG strongly believes the DEIS provides the general public a distorted effect of each alternative. There is no overall description of the potential negative effects by focusing narrowly on the Izembek Wilderness within the Isthmus between the Izembek Lagoon Complex and Kinzarof Lagoon while ignoring the unique resources that will be removed from the Izembek Wilderness under Alternatives 1, 4, and 5.

## RECOMMENDATIONS

### THE KCG RECOMMENDS --

- 9. THE FEIS RE-EXAMINE THE DEIS CONCLUSION THAT THE NO ACTION ALTERNATIVE AS WELL AS ALTERNATIVES 4 AND 5 KING COVE CORPORATION OWNERSHIPS WITHIN THE IZEMBEK NATIONAL WILDLIFE REFUGE WILL BE SUBJECT TO MANAGEMENT AS DETERMINED COMPATIBLE BY THE SERVICE UNDER THE PROVISIONS OF ANCSA SECTION 22(g) AND THEREFORE LAND USE ON KING COVE CORPORATION OWNERSHIP WOULD HAVE A CUMULATIVE "MINOR" EFFECT. IT IS IMPORTANT TO REMEMBER THAT IN 2003 THE SERVICE AND CORPS ISSUED DECISIONS ON KING COVE CORPORATION OWNERSHIP SUBJECT TO ANILCA SECTION 22(G) RESULTING IN THE CONSTRUCTION OF A ROAD AND HOVERCRAFT TERMINAL. OR THAT ON MARCH 30, 2009 THE CONGRESS DETERMINED THAT A ROAD COULD BE CONSTRUCTED THROUGH THE IZEMBEK WILDERNESS. UNDER ALTERNATIVES 1, 4 AND 5 A TOTAL OF 8,032 ACRES WILL REMAIN PRIVATE LAND FOREVER AND IT IS NOT REASONABLE FOR THE SERVICE TO ASSUME THERE WOULD NEVER BE ANY DEVELOPMENT OR THAT ANY DEVELOPMENT WOULD BE MINIMAL IN CONTEXT BECAUSE OF ANSCA SECTION 22(g).
- 10. THE FEIS RE-EXAMINE THE DEIS CONCLUSION THERE WILL BE ONLY A CUMULATIVE "MINOR" EFFECT FOR THE 8,093 ACRES OF THE MORTSENS LAGOON PARCEL. NOT ONLY IS THIS PARCEL DIRECTLY ACCESSIBLE BY ROAD FROM THE CITY OF COLD BAY, BUT IT IS NOT SUBJECT TO THE PROVISIONS OF ANSCA SECTION 22(g).
- 11. THE FEIS SHOULD ADDRESS THE CUMULATIVE EFFECT OF ALTERNATIVES 1, 4 AND 5 ON FUTURE LAND USE ON THE STATE PARCELS.

The DEIS does not identify either a Preferred Alternative or the Environmentally Preferable Alternative. The KCG respectively recommends Alternative 2 (Land Exchange/Southern Road Corridor) be selected as the Preferred Alternative and the Environmentally Preferable Alternative. Alternative 2 crosses less Wilderness, has fewer miles of road in the watershed of the Izembek Lagoon Complex, avoids a designated Critical Habitat for Steller's Eider molting area in Izembek Lagoon, and provides the more protection for unrestricted caribou migration. However, the KCG can also support Alternative 3 (Land Exchange/Central Road Corridor) which seems to affect less wetlands and fish streams in the Izembek Lagoon Complex. In fact both road corridors share about 11 miles and deviate only in the center of the 19-22 mile long road corridors. and for 1.1 or 1.2 miles in the Blinn Lake Parcel. The Secretary will make a solid supportable choice by finding either Alternative 2 or Alternative 3 is in the public interest when the FEIS is finished. Table 3 (Attachment 1) provides the KCG summary and rationale of the effects of Alternatives 1, 2, and 3 as well as whether the effect is beneficial, negative, or no effect. This analysis considers the hovercraft and ferry (Alternatives 4 and 5) to have the same effect on land ownership as the No Action with the major exceptions being the very high economic costs for only one half that of a road do not appear viable.

**THE FACT THAT THE SERVICE, FOR A VARIETY OF REASONS, HAS CONSUMED 3 YEARS OF THE 7 YEAR PERIOD TO ISSUE THIS DEIS IS OF GREAT AND CONTINUING CONCERN TO THE KCG .**

**RECOMMENDATIONS**

**HE KCG RECOMMENDS --**

- **12. THE FEIS INCLUDE A FULL DISCLOSURE OF THE EFFECTS OF ALTERNATIVES 2 AND 3, NOT JUST THE 236 ACRES OF FEDERAL OWNERSHIP IN THE SOUTHERN ROAD CORRIDOR OR THE 262 ACRES OF FEDERAL OWNERSHIP IN THE CENTRAL ROAD CORRIDOR INCLUDING THE ADDITION OF STATE AND KING COVE CORPORATION LANDS AND THE RELINQUISHMENT OF THE CURRENT KING CORPORATION SELECTION.**
- **13. THE FEIS INCLUDE A DETERMINATION NOT ONLY WHETHER THE EFFECT IS NEGLIGIBLE, MINOR, MODERATE, OR MAJOR, BUT ALSO WHETHER THE OVERALL EFFECT HAS A BENEFICIAL EFFECT, A NEGATIVE EFFECT, OR NO EFFECT.**

## THE EIS PROCESS

The process used for developing the DEIS was largely shaped by updating and expanding the data presented in the 2003 Corps EIS for the "*King Cove Access Project*" and general resource distribution and habitat values contained in the Service 1998 "*Land Protection Plan Options for the Protection of Fish and Wildlife Habitats, Izembek Refuge Complex*". In 2008 the AEB did a review of the actual construction and effectiveness of the environmental protections for the road to the northeast corner of Cold Bay. That review was prepared by the AEB for the Alaska DOT & PF and the Federal Highway Administration in support for a request for supplemental Federal funding to complete the authorized project. This report was provided to the Service during scoping.

The No Action Alternative cannot include a hovercraft operation as part of the No Action Alternative. The AEB provided the Service information on the operational costs and inability of the hovercraft to reliably operate on Cold Bay which is incorporated in this DEIS. Due to the inability of the hovercraft to provide neither reliable or nor cost effective transportation between the City of King Cove and the Cold Bay Airport, the AEB suspended operations in November 2010 and notified the Service that it will try to resume limited operation in 2012 or 2013 with limited 3-day/week schedule from April through October. After extensive review, the AEB concluded the hovercraft operation on Cold Bay was neither economically viable nor reliable. The Service was notified of this final decision on November 15, 2011.

In the absence of hovercraft use, the AEB has outlined a conceptual plan for an aluminum landing craft that might be modified to allow the vessel to use the landing pads at the northeast corner and at Cross Wind Cove. It must be noted that this conceptual plan IS only a concept. There is no vessel and the concept will only be explored further if and only if the Secretary does not find the land exchange is in the public interest.

**THE KCG BELIEVES FERVENTLY THAT THE ONLY SOLUTION WHICH CAN MEET THE PURPOSE AND NEED OF THIS EIS AND PROVIDE THE SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION DEFINED IN SUBTITLE E IS EITHER ALTERNATIVE 2 OR ALTERNATIVE 3.**

On March 29, 2012, the AEB provided the Service a copy of Corps correspondence dated March 20, 2012 to the Service. On April 18, 2012 the Service requested supplemental information about the conceptual landing craft/passenger ferry.

As Cooperators the KCG was surprised and extremely disappointed to find that the Service made significant changes to the preliminary conclusions in the Preliminary DEIS distributed by the Service for Cooperator review and comment without consultation with the KCG or other Cooperators before the DEIS was released. These unilateral changes by the Service have a direct, and in our view, biased effect on the information presented to the public in this DEIS. One of the major negative impacts that was unilaterally increased by the Service was for Tundra Swans that went from a "moderate" to a "major" impact with no support or information to justify this change. The DEIS does not contain any

discussion of where and how many Tundra Swans pairs and nests are located leaving it difficult to validate the context and relevance of the increased impact conclusion. The KCG will have specific comments on the Tundra Swans and mitigation measures the Service should address as part of the FEIS and Record of Decision.

The Aleuts and local residents of the City of King Cove (2000 Census population 792) have a long history of unsatisfactory relationships with the Service that range from burning privately built cabins to recommending establishment of the Izembek Wilderness without the courtesy of a local hearing, to the 1986 expansion of just the watershed of the Izembek Lagoon Complex as Wetlands of International Importance to all wetlands, regardless of ownership without consideration of the effect on King Cove Corporation ownerships and selections granted under ANCSA, to attempting to prohibit the use of ATVs on established trails/roads in the Wilderness contrary to the requirements of ANCSA Title VIII for traditional access for subsistence purposes. The KCG requested documentation on the 1986 expansion of the RAMSAR wetland designation to the entire Izembek National Wildlife Refuge. As of the date of these comments, the Service has been unable to provide any documentation. The most recent unilateral decision by the Service to not consult Cooperators on significant changes to the effects assessments now in the DEIS has provided a negative experience for the KCG which it believes were in violation of Federal law and regulation and duty owned by the Service to consult with the Agdaagux and Befkoski Tribes prior to any decision.

**HAVING EXPRESSED OUR CONCERNS, THE KCG REMAINS ANXIOUS TO ASSIST THE SERVICE IN PRODUCING A FEIS THAT MEETS THE REQUIREMENTS OF SUBTITLE E AND NEPA AND THAT ELIMINATES THE REQUIREMENT FOR A SUPPLEMENTAL OR NEW EIS WHEN PERMITS TO CONSTRUCT AND OPERATE A SAFE, RELIABLE, AND AFFORDABLE ROAD ARE FILED WITH THE CORPS AND OTHER FEDERAL, STATE, LOCAL, AND THE KING COVE CORPORATION AS ENVISIONED IN SUBTITLE E.**

## HISTORY

The King Cove Corporation Shareholders are Aleuts whose ancestors have resided on and used for thousands of years the lands that are now the Izembek NWR, Alaska Peninsula NWR and the King Cove Corporation lands that will be transferred to the Federal Government for addition to the National Refuge System.

A number of past Federal and State studies have examined the potential to have an all-weather road system that connects the City of King Cove to the Cold Bay Airport, the most recent being the King Cove Access Project (2003) led by the U.S. Army Corps of Engineers (Corps) with the Service being a Cooperator and the AEB the applicant. The 2003 EIS examined in detail the option of a road/hovercraft transportation system, a road/ferry transportation system, a road/helicopter transportation system, and a no transportation system. At the request of the Aleutians East Borough, the Corps chose to include an all road transportation system for comparative purposes. The Federal Law that funded the 2003 EIS and subsequent implementation of a road-marine transportation system expressly prohibited construction across the Izembek Wilderness. At the conclusion of the EIS process, the Corps issued a Record of Decision and authorization to implement a road/hovercraft transportation system which is Alternative 4 in this DEIS with some updated information. Likewise, the road-Ferry transportation evaluated in the Corps 2003 EIS is carried forward as Alternative 5 with some updated information. Alternative 2 in this DEIS is an all-weather single lane gravel road that is generally the same as the one considered in the Corps 2003 EIS as Alternative 6.

Although the evaluations in the Corps 2003 EIS are dated, they were reviewed and affirmed in the "*Completions Project, King Cove Access Project Categorical Exclusion Documentation Form and Attachments (Project Number 59791)*". The 2008 report re-examined the original environmental protections and the effectiveness of these protections when applied to actual road construction and actual operation of the hovercraft from a temporary terminal at Lenard Harbor. The Alaska Department of Transportation & Public Facilities and Federal Highway Administration accepted the AEB report and approved Federal funding. This information, including more than 100 required stipulations were provided to the Service during scoping for this EIS as a basis to develop the design and environmental mitigations for a road across the Izembek NWR.

Attachment 2 provides a summary of the six decades of history associated with the City of King Cove and the need to have safe, reliable, and affordable access to the Cold Bay Airport.

**PURPOSE**

The purpose of the land exchange is to provide Federal land to the State of Alaska to construct, operate, and maintain a single-lane gravel road providing safe, reliable and cost effective access between the City of King Cove and the Cold Bay Airport. Subtitle E requires this 19-21 mile segment of road be used primarily for health and safety purposes, except for taxis, commercial vans for public transportation and shared rides not to be used for commercial purposes between the northeast corner of Cold Bay and the Cold Bay road system.

The 792 residents as well as visitors and other non-permanent residents of King Cove and the 75 residents as well as the 7,600 visitors to the Izembek NWR in 2010 are in an area classified by the Federal Government as a "Medically Underserved Area" (an area with too few primary care providers, high infant mortality, high poverty, and/or high elderly populations). In 2010 there were 10 medical emergencies involving transporting patients from King Cove. An additional 54 patients having urgent referrals for medical treatment were transported to Anchorage for treatment. Between March 1, 2011 and mid April 2012 there were 21 medevacs from the King Cove Clinic.

Another component for medical travel is long-lead time appointments in Anchorage for non-emergency or non-urgent medical care not available in the King Cove Clinic. The DEIS does not discuss the magnitude of either long-lead medical appointments.

Table 4. KCG Conclusions on the Ability of each Alternative to Meet the Purpose of Providing Safe, Reliable, and Affordable Transportation between the City of King Cove and the Cold Bay Airport as Envisioned by Subtitle E

	<b>NO LAND EXCHANGE WITH CONCEPTUAL PASSENGER CARRYING LANDING CRAFT <i>(ALTERNATIVE 1)</i></b>	<b>LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR <i>(ALTERNATIVE 2)</i></b>	<b>LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR <i>(ALTERNATIVE 3)</i></b>	<b>NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT <i>(ALTERNATIVE 4)</i></b>	<b>NO LAND EXCHANGE WITH A CONCEPTUAL FERRY BETWEEN LENARD HARBOR AND THE COLD BAY DOCK <i>ALTERNATIVE 5)</i></b>
<b>MEETS THE PURPOSE OF SUBTITLE E</b>	<b>NO</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>

## NEED

The DEIS evaluates the need for each Alternative on the basis of providing year-around transportation between the City of King Cove and the Cold Bay Airport that is safe, reliable, affordable, and enhances the quality of life of local residents. The KCG analysis of information presented or implied by the Service in the DEIS are discussed in the following subsections for safety, reliability, and affordability.

**Safety** -- All transportation between the City of King Cove and the Cold Bay Airport can meet the respective safe operating conditions reflected in the design and operational standards for each transportation mode. It is recognized that each transportation mode has different safety operational standards with sea conditions on Cold Bay being a limiting safety factor for the conceptual vessel under Alternative 1, a hovercraft under Alternative 4 and a ferry under Alternative 5. A road under Alternative 2 or Alternative 3 is presumed to have essentially the same capabilities for the purposes of safety.

**Reliability** -- The reliability of each transportation mode is measured on the basis of two significant components:

- 1 Availability for 24/7 to meet emergency or urgent medical evacuation by a patient for the City of King Cove to the Cold Bay Airport, and
- 2 Availability of a person in the City of King Cove to connect to scheduled air service from the Cold Bay Airport and to return to the City of King Cove.

The KCG has consistently commented to the Service that reliability needs to be considered on the basis of both the assumed schedule and on a 365 day-a-year emergency medical evacuation basis for each mode of travel.

### RECOMMENDATIONS

#### THE KCG RECOMMENDS --

- 14. THE SERVICE MUST INCLUDE A COMPARATIVE ANALYSIS OF EACH ALTERNATIVE TO PROVIDE 24/7/365 TRANSPORTATION OF A PATIENT WITH AN EMERGENCY MEDICAL CONDITION FROM THE CITY OF KING COVE TO THE COLD BAY AIRPORT -- KCG PROVIDED THE SERVICE THIS COMMENT AND RECOMMENDATION ON DECEMBER 23, 2011.
- 15. THE SERVICE SHOULD INCLUDE A COMPARATIVE ANALYSIS OF EACH ALTERNATIVE TO MEET SCHEDULED AIR SERVICE TO AND FROM THE COLD BAY AIRPORT-- KCG PROVIDED THE SERVICE THIS COMMENT AND RECOMMENDATION ON DECEMBER 23, 2011.

This DEIS still has a primary focus on the ability of each alternative to meet scheduled operations, schedules which range from being available on a 24/7 basis to ones with a single round trip 6 days a week with significantly different operating constraints. Based on the KCG collective knowledge of

existing transportation modes between the City of King Cove and the Cold Bay Airport, the KCG is providing the Service data that should be included in the FEIS.

***Existing and No Action Transportation*** -- The Cold Bay Airport is shut down 5 to 6 days a year by snow or by severe weather. Otherwise, air service from the Cold Bay Airport is available for arrivals and departures on a 24/7 basis 365 days a year. (See Table 5.)

Existing air service between the King Cove Airport and the Cold Bay Airport is restricted by the topographic location of the King Cove Airport and the ability of air service originating in Anchorage for outbound service and return service from Dutch Harbor. Air service at the King Cove Airport is not available on a 24/7 basis irrespective of weather because terrain limits safe air access to and from the airport for scheduled, for chartered, or for emergency medical purposes or for any other emergency purpose are restricted to daylight hours and then only when FAA Visual Flight Rules can be met. The Corps 2003 EIS notes that air service to and from the King Cove Airport was not available 55 days a year (85 percent) which is not inconsistent with the most recent schedule completion reported by PenAir as approximately 44 days a year (88 percent) in 2010. Due to visibility restrictions during daylight hours at the King Cove Airport there are up to 91 days a year when scheduled or chartered air service to or from the King Cove Airport is delayed. Similar data for schedule delays at the King Cove Airport is not reported in the DEIS. Thus, immediate access for an emergency situation is severely limited.

***All Weather Road*** -- A road located in either the Southern or Central Road Corridors will be available on a 24/7 basis 365 days a year. The Corps 2003 EIS assumed an all-weather road will be available except for up to 4 days a year. The DEIS assumed a road in either the Southern Road Corridor (Alternative 2) or the Central Road Corridor (Alternative 3) will have a 98 percent reliability on a 24/7 basis to meet scheduled operations, e.g. not available for a total of up to 7 days a year under either Alternative 2 or Alternative 3. Snow and storm washouts will be the reason for road closures, which is approximately the same period that the Cold Bay Airport is closed by snow and severe weather. This represents a virtually 24/7/365 solution of immediate transport 98 percent of the time. (See Table 6.)

***Hovercraft*** -- Hovercraft operations are limited by sea conditions on Cold Bay that exceed winds of 30 knots and seas that are not more than 6 feet in height. The road between the City of King Cove and Cold Bay is reasonably expected to have road closures up to 3 to 5 days a year due to snow removal or storm event washouts. The proposed operation of 1 round trip on a 6 day a week schedule for the hovercraft under Alternative 4 means scheduled hovercraft service is not available for 52 days a year regardless of sea conditions. The Service has assumed the hovercraft will have a 70 percent reliability to meet scheduled operations, e.g. not available for an additional 94 schedule-days due to sea conditions or maintenance/crew availability for a total unavailability of the hovercraft to provide service to meet scheduled air service at the Cold Bay Airport for a total of up to 146 days a year. Existing authorizations for hovercraft operations between the northeast corner of Cold Bay and Cross Wind Cove provide an exemption for "life-threatening medical emergencies" that will be available even when inside the No Transit Zone established to prevent adverse impact to wildlife species (see

Mitigation Measure 5.B.i). Urgent medical referrals or scheduled or long-lead medical appointments or other urgent travel requirements do not qualify for this Corps/Service approved exemption. Overall, the reliability of the past hovercraft operation on Cold Bay is essentially no better than the reliability of existing transportation (see Tables 5 and 7)

**Ferry** -- Depending on the selected design, the conceptual ferry operations under Alternative 5 may be somewhat improved over a yet to be designed hovercraft. However, the conceptual ferry will operate in more severe sea conditions between Lenard Harbor and a modified Cold Bay Dock under Alternative 5. The ferry will not be available for 52 days a year due to the 6-day a week schedule. Winds at the Cold Bay Airport have recorded gusts exceeding 70 knots sometime during the months of November and January with the other months exceeding 50 knots add an additional but unidentified period when a ferry could not safely use the Lenard Harbor ferry terminal or the modified Cold Bay Dock which extends more than 2,000 feet into the unprotected waters of Cold Bay to winds from the Bering Sea or from the North Pacific Ocean. The proposed 6 day a week schedule for the ferry under Alternative 5 means scheduled hovercraft service it is not available for 52 days a year regardless of sea conditions. Road closures due to snow or storm washouts will account for up to 2 days a year. The DEIS assumed the ferry will have a 99 percent reliability to meet scheduled operations, e.g. not available for an additional 3 schedule-days due to sea conditions or maintenance/crew availability for a total unavailability of the ferry to provide service to meet scheduled air service at the Cold Bay Airport for a total of up to 55 days a year. A ferry will have also have a minimum of two 7-days a year out-of-service for USCG mandatory dry-dock inspection of a passenger carrying vessel every 2 years. (See Table 8.)

**Affordability** -- The Corps 2003 EIS presented an economic analysis that assumed a common base of 3,500 riders each for a hovercraft, a ferry, and for the Isthmus Road with an annual subsidy of \$460,000 from the AEB. Capital costs assumed in the Corps 2003 EIS considered each alternative as a wholly independent project. For example, the capital costs for the hovercraft included constructing more than 17 miles of road to the hovercraft terminal; whereas, the Isthmus Road included the same 17 miles of road for a total of more than 33 miles of road. The Land Exchange/Road DEIS considers only the incremental costs for any missing component by assuming the road to the northeast corner and hovercraft terminals are complete.

The DEIS does not include an estimated acquisition cost of at least \$9,000,000 for a new and if possible a hovercraft with improved sea keeping capabilities. The economic analysis presented in the Land Exchange/Road Corridor DEIS is by the same consultant that prepared the economic analysis for the Corps 2003 EIS. There are major differences between the two sets of economic projections. It is not clear on the reasons for the changes between the 2003 EIS and this DEIS as projected operating costs in this DEIS are substantially higher (\$870,000 in 2003 vs. \$2,000,000 in 2012 for a road-hovercraft operation transportation mode and for the road-ferry operation ( \$660,000 in 2003 vs. \$2,300,000 in 2012). The number of passengers using either the hovercraft or the ferry was significantly different (3,500 passengers for both modes in Corps 2003 EIS vs. 1,630 passengers in 2016 -- the estimated year when the hovercraft or ferry reaches full operation in this DEIS. Although the AEB formally informed

the Service on November 15, 2011 that hovercraft operations will not be resumed, the economic evaluations presented in this DEIS assumes a hovercraft will:

- OPERATE ON A 3 DAY A WEEK SCHEDULE FOR THE PERIOD OF APRIL THROUGH OCTOBER WITH NO SCHEDULED SERVICE FOR THE OTHER 5 MONTHS
- HAVE AN ASSUMED BASELINE ANNUAL PASSENGER LOAD OF ABOUT 800 FOR THE YEAR 2016 WHEN AN ALL-WEATHER ROAD, HOVERCRAFT, OR FERRY SYSTEM WILL BE FULLY OPERATIONAL

These baseline cost assumptions are included in the economic considerations which are included in the evaluation of the hovercraft operation (Alternative 4) and the ferry operation (Alternative 5).

Capital costs for the road-hovercraft operation (Alternative 4) assumed the AEB hovercraft will be available for use on Cold Bay and included no cost for acquisition of a hovercraft with improved sea keeping design. The AEB estimates the acquisition cost for a modified hovercraft and critical long-lead replacement parts delivered to Cold Bay will be approximately \$9,000,000.

Funding, estimated annual operating costs and annual ridership of the conceptual landing barge travelling between the northeast corner of Cold Bay and Cross Wind Cove are speculative. The DEIS assumes the State will be generally responsible for the operational costs of a road in either the Southern Road Corridor or the Central Road Corridor. Neither Alternative 4 (hovercraft) nor Alternative 5 (ferry) addresses the probable applicant and the source of funding for the capital and annual operating costs. The AEB has repeatedly informed the Service that the AEB should not be considered as the operator of either the hovercraft or the ferry alternatives. (See Table 10.)

#### RECOMMENDATIONS

##### THE KCG RECOMMENDS --

- 16. THE SERVICE SHOULD ELIMINATE THE ASSUMPTION THAT ALL ALTERNATIVES WILL HAVE A BASELINE CONDITION WITH LIMITED HOVERCRAFT OPERATIONS BETWEEN THE NORTHEAST CORNER OF COLD BAY TO CROSS WIND COVE THAT WILL HAVE AN ANNUAL PASSENGER LOAD OF ABOUT 800 FOR THE YEAR 2016 -- KCG PROVIDED THE SERVICE THIS COMMENT AND RECOMMENDATIONS ON DECEMBER 23, 2011.
- 17. THE SERVICE REVISE THE CAPITAL COST OF THE HOVERCRAFT (ALTERNATIVE 4) TO INCLUDE AN ACQUISITION COST OF AT LEAST \$9,000,000 -- KCG PROVIDED THE SERVICE THE COMMENT ON DECEMBER 23, 2011. THIS KCG COMMENT PROVIDES THE SERVICE OUR BEST ESTIMATE FOR THE ACQUISITION COST OF A HOVERCRAFT WITH AN IMPROVED DESIGNED TO MEET SEA CONDITIONS ON COLD BAY.
- 18. THE SERVICE ADDRESS THE PROBABLE OPERATOR OF THE HOVERCRAFT UNDER ALTERNATIVE 4 AND ANTICIPATED SOURCE OF THE \$2,000,000 ANNUAL OPERATING COST WHICH HAS AN AVERAGE COST OF APPROXIATELY \$1,248 PER PASSENGER.
- 19. THE SERVICE ADDRESS THE PROBABLE OPERATOR OF THE FERRY UNDER ALTERNATIVE 5 AND ANTICIPATED SOURCE OF THE \$2,300,000 ANNUAL OPERATING COST WHICH HAS AN AVERAGE COST OF APPROXIATELY \$1,435 PER PASSENGER.

Table 5. Summary of the KCG Conclusions on the Reliability of Transportation between the City of King Cove and the Cold Bay Airport under the No Action Alternative.

RELIABILITY MEASURE	TRAVEL MODE
<p><b>24/7 EMERGENCY MEDICAL TRAVEL AND URGENT MEDICAL REFERRAL TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT</b></p>	<p><b>NO</b> <b>(SEE LIMITATIONS BELOW)</b></p>
<p><b>MEET SCHEDULED AIR SERVICE AT THE COLD BAY AIRPORT</b></p>	<p><b>AIR SERVICE</b></p> <ul style="list-style-type: none"> <li>• KING COVE AIRPORT CLOSED BETWEEN SUNSET AND SUNRISE 365 DAYS A YEAR</li> <li>• KING COVE AIRPORT CLOSED 55 DAYS A YEAR DURING DAYLIGHT HOURS DUE TO WEATHER</li> <li>• KING COVE AIRPORT HAS DELAYED SCHEDULED AIR SERVICE DURING DAYLIGHT HOURS DUE TO WEATHER AN ADDITIONAL 91 DAYS A YEAR</li> </ul> <p><b>VESSEL SERVICE</b></p> <ul style="list-style-type: none"> <li>• TRAVEL BY CHARTER VESSEL FROM THE KING COVE HARBOR TO THE COLD BAY DOCK RESTRICTED BY SEA CONDITIONS AT THE COLD BAY DOCK AND BY SEVERE WEATHER ON THE NORTH PACIFIC OCEAN THAT A CHARTER VESSEL MUST CROSS IN GETTING TO OR FROM THE KING COVE HARBOR AND THE COLD BAY DOCK</li> <li>• THE SEA KEEPING ABILITIES OF THE CONCEPTUAL PASSENGER CARRYING LANDING CRAFT OPERATING OUT OF THE NORTHEAST CORNER OF COLD BAY AND CROSS WIND COVE IS UNKNOWN</li> </ul>

Table 6. Summary of the KCG Conclusions on the Reliability of Road Transportation between the City of King Cove and the Cold Bay Airport under Alternatives 2 and Alternative 3.

RELIABILTY MEASURE	TRAVEL MODE
<p><b>24/7 EMERGENCY MEDICAL TRAVEL AND URGENT MEDICAL REFERRAL TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT</b></p>	<ul style="list-style-type: none"> <li>• <b>24/7 AVAILABILITY 365 DAYS A YEAR.</b></li> <li>• <b>ROAD CLOSURES DUE TO SNOW AND STORM WASHOUTS UP TO 7 DAYS A YEAR ARE ASSUMED TO BE COINCIDENT WITH THE SAME PERIODS THE COLD BAY AIRPORT IS CLOSED</b></li> </ul>
<p><b>MEET SCHEDULED AIR SERVICE AT THE COLD BAY</b></p>	<ul style="list-style-type: none"> <li>• <b>24/7 AVAILABILITY 365 DAYS A YEAR.</b></li> <li>• <b>ROAD CLOSURES DUE TO SNOW AND STORM WASHOUTS UP TO 7 DAYS A YEAR ARE ASSUMED TO BE COINCIDENT WITH THE SAME PERIODS THE COLD BAY AIRPORT IS CLOSED</b></li> </ul>

Table 7. Summary of the KCG Conclusions on the Reliability of Hovercraft Transportation between the Northeast Corner of Cold Bay and Cross Wind Cove under Alternative 4.

RELIABILITY MEASURE	HOVERCRAFT CAPABILITY
<p><b>24/7 EMERGENCY MEDICAL TRAVEL AND URGENT MEDICAL REFERRAL TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT</b></p>	<ul style="list-style-type: none"> <li>• <b>24/7 AVAILABILITY TO MEET ONLY LIFE THREATENING MEDICAL EMERGENCY UNDER EXISTING CORPS AND SERVICE AUTHORIZATIONS FOR HOVERCRAFT TRAVEL CLOSE TO THE NORTHERN SHORE OF COLD BAY WHEN SEA CONDITIONS ALONG NORMAL TRAVEL ROUTE EXCEEDS SAFE OPERATION OF THE HOVERCRAFT</b></li> </ul>
<p><b>MEET SCHEDULED AIR SERVICE AT THE COLD BAY AIRPORT</b></p>	<ul style="list-style-type: none"> <li>• <b>1 ROUND TRIP/6 DAYS A WEEK</b></li> <li>• <b>52 DAYS A YEAR WITH NO SCHEDULED SERVICE</b></li> <li>• <b>94 DAYS WHEN SEA CONDITIONS DO NOT ALLOW SAFE HOVERCRAFT OPERATIONS TO MEET SCHEDULED AIR SERVICE FROM THE COLD BAY AIRPORT</b></li> <li>• <b>ROAD CLOSURE FOR UP 3 TO 5 DAYS A YEAR ARE ASSUMED TO BE COINCIDENT WITH THE SAME PERIODS THE COLD BAY AIRPORT IS CLOSED</b></li> </ul>

Table 8. Summary of the KCG Conclusions on the Reliability of Ferry Transportation between the Lenard Harbor and a Modified Cold Bay Dock under Alternative 5.

RELIABILITY MEASURE	FERRY CAPABILITY
<p><b>24/7 EMERGENCY MEDICAL TRAVEL AND URGENT MEDICAL REFERRAL TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT</b></p>	<p><b>NO (SEE LIMITATIONS BELOW)</b></p>
<p><b>MEET SCHEDULED AIR SERVICE AT THE COLD BAY AIRPORT</b></p>	<ul style="list-style-type: none"> <li>• <b>1 ROUND TRIP/6 DAYS A WEEK</b></li> <li>• <b>24/7 AVAILABILITY FOR EMERGENCY MEDICAL EVACUATION NOT CERTAIN DUE TO SEA CONDITIONS AT THE COLD BAY DOCK AND/OR THE LENARD HARBOR TERMINAL</b></li> <li>• <b>52 DAYS A YEAR WITH NO SCHEDULED SERVICE</b></li> <li>• <b>MINIMUM OF 3 SCHEDULE DAYS WHEN SEA CONDITIONS TO NOT ALLOW SAFE FERRY OPERATIONS TO MEET SCHEDULED AIR SERVICE FROM THE COLD BAY AIRPORT</b></li> <li>• <b>ROAD CLOSURES FOR UP TO 2 DAYS ARE ASSUMED TO BE COINCIDENT WITH THE SAME PERIODS THE COLD BAY AIRPORT IS CLOSED</b></li> <li>• <b>MINIMUM OF 7 DAYS EVERY 2 YEARS FOR USCG MANDATORY DRY-DOCK INSPECTION TO MAINTAIN PASSENGER CARRYING CERTIFICATION; LONGER WHEN MAJOR REPAIRS OR BOTTOM PAINTING REQUIRED</b></li> </ul>

Table 9. KCG Overall Conclusions on the Reliability of each Alternative to Provide Transportation between the City of King Cove and the Cold Bay Airport for Emergency Medical Evacuation and for Other Travelers to Connect to Scheduled Air Service from the Cold Bay Airport.

TRANSPORTATION MODE	RELIABILITY TO MEET EMERGENCY MEDICAL EVACUATION	RELIABILITY TO MEET SCHEDULED AIR SERVICE AT THE COLD BAY AIRPORT
ALTERNATIVE 1 (EXISTING TRANSPORTATION AND CONCEPTUAL LANDING CRAFT OPERATING BETWEEN THE NORTHEAST CORNER OF COLD BAY AND CROSS WIND COVE)	NO FOR EXISTING TRANSPORTATION  SPECULATIVE FOR CONCEPTUAL LANDING CRAFT	NO FOR EXISTING TRANSPORTATION  SPECULATIVE FOR CONCEPTUAL LANDING CRAFT
ALTERNATIVE 2 (LAND EXCHANGE/ROAD IN SOUTHERN ROAD CORRIDOR)	YES	YES
ALTERNATIVE 3 (LAND EXCHANGE/ROAD IN CENTRAL ROAD CORRIDOR)	YES	YES
ALTERNATIVE 4 (HOVERCRAFT BETWEEN THE NORTHEAST CORNER OF COLD BAY AND CROSS WIND COVE)	ONLY FOR PATIENTS WITH LIFE THREATENING CONDITIONS	NO
ALTERNATIVE 5 (FERRY BETWEEN LENARD HARBOR AND A MODIFIED COLD BAY DOCK)	NO	NO

Table 10. Comparison of the Ability of each Alternative to Provide Cost Effective Transportation between the City of King Cove and the Cold Bay Airport in the Corps 2003 EIS and this DEIS.

	NO LAND EXCHANGE WITH CONCEPTUAL PASSENGER CARRYING LANDING CRAFT  <i>(ALTERNATIVE 1)</i>	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR  <i>(ALTERNATIVE 2)</i>	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR  <i>(ALTERNATIVE 3)</i>	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT  <i>(ALTERNATIVE 4)</i>	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY BETWEEN LENARD HARBOR AND THE COLD BAY DOCK  <i>(ALTERNATIVE 5)</i>
MEETS CRITERIA FOR AFFORDABLE OPERATION	UNKNOWN FOR COCEPTUAL LANDING CRAFT	YES	YES	NO	NO
CAPITAL COST	<u>[NO CAPITAL COSTS IDENTIFIED]</u>  COST FOR CONCEPTUAL LANDING CRAFT IS SPECULATIVE	<u>[\$23,210,000]</u> <u>FOR 33.5 MILES OF GRAVEL ROAD]</u>  \$20,700,00 FOR 19.4 MILES OF NEW GRAVEL ROAD	<u>[\$23,210,000]</u> <u>FOR 33.5 MILES OF GRAVEL ROAD</u>  \$22,700,000 FOR 21 MILES OF NEW GRAVEL ROAD	<u>[\$19,050,000 TO \$23,410,000]</u>  <i>DEPENDING ON THE TYPE HOVERCRAFT ACQUIRED, 17 MILES OF ROAD AND 2 HOVERCRAFT TERMINALS]</i>  NONE -- ADD \$9,000,000 FOR ACQUISITION OF A HOVERCRAFT WITH IMPROVED SEA KEEPING DESIGN	<u>[\$17,600,000 TO \$19,200,000]</u>  <i>DEPENDING ON THE TYPE OF FERRY ACQUIRED, INCLUDES 5.6 MILES OF ROAD, FERRY TERMINAL, AND MODIFICATIONS TO THE COLD BAY DOCK]</i>  \$27,100,000 FOR FERRY ACQUISITION, FERRY TERMINAL AND FOR MODIFICATIONS TO THE COLD BAY DOCK
ANNUAL OPERATING COST INCLUDING MAINTENANCE AND REPLACEMENT	<u>[NO ANNUAL OPERATING COSTS IDENTIFIED]</u>  COST FOR CONCEPTUAL LANDING CRAFT IS SPECULATIVE	<u>[\$90,000]</u>  \$149,000	<u>[\$90,000 FOR 33 MILES OF ROAD]</u>  \$158,000	<u>[\$870,000]</u>  \$2,000,000	<u>[\$660,000]</u>  \$2,300,000

TRIP COST	<u>[\$70.00 AIR IN BASE YEAR 2000 \$120 ON CHARTER VESSEL WITH 5 OTHER PASSENGERS]</u>  \$106.08 FOR AIR  TRIP COST FOR CONCEPTUAL LANDING CRAFT IS SPECULATIVE	<u>[\$457]<sup>a</sup></u>  \$45 FOR OPERATIONAL COST OF VEHICLE	<u>[\$45]<sup>a</sup></u>  \$47 FOR OPERATIONAL COST OF VEHICLE	<u>[\$115]</u>  \$100 INCLUDES OPERATIONAL COST OF VEHICLE	<u>[\$24]</u>  \$90 INCLUDES OPERATIONAL COST OF VEHICLE
ANNUAL RIDERSHIP	<u>[2,577 AIR PASSENGERS, 339 ALASKA FERRY PASSENGERS IN BASE YEAR 2000]</u>  4,427 TOTAL IN 2016.  NUMBER OF PASSENGERS ON CONCEPTUAL LANDING CRAFT IS SPECULATIVE	<u>[3,500]</u>  3,652 VEHICLE PASSENGERS IN 2016	<u>[3,500]</u>  3,652 VEHICLE PASSENGERS IN 2016	<u>[3,500]</u>  1,603 HOVERCRAFT PASSENGERS IN 2016	<u>[3,500]</u>  1,603 FERRY PASSENGERS IN 2016
OPERATIONAL COST PER PASSENGER	<u>[NO DATA]</u>  SPECULATIVE	<u>[\$25.71]</u>  \$40.80	<u>[\$25.71]</u>  \$43.26	<u>[\$1,247.66]</u>  \$1,247.66	<u>[\$188.57]</u>  \$1,434.81

NOTE: BRACKETS AND UNDERLINE ARE DATA FROM THE CORPS 2003 EIS

<sup>a</sup> THE CORPS REQUIRED THE ROUND TRIP COSTS TO REFLECT THE FACT THAT IT COULD NOT BE AUTHORIZED UNDER THE KING COVE HEALTH AND SAFETY ACT. THEREFORE NO FEDERAL FUNDING COULD BE USED AND THE ROAD SHOULD BE OPERATED AS A TOLL ROAD WITH 100 PERCENT COST RECOVERY.

**Quality of Life** -- Primary factors influencing the quality of life for residents, workers, and visitors to the City of King Cove are safety, reliability, and out-of-pocket transportation cost. The foremost factor is the reliability to serve travel for emergency medical or urgent medical purposes which have a positive benefit in giving sick and injured Elders a choice on staying in King Cove vs. moving to Anchorage. The next most important factors are reliability to meet scheduled air transportation at the Cold Bay Airport including delivery of the U.S. Mail. The third element is the overall cost of transportation between the City of King Cove and the City of Cold Bay. Either Alternative 2 or Alternative 3 is superior in these quality of life factors to either the hovercraft or the ferry. The most reliable, least costly mode of transportation will have a direct and positive effect on the individual and family disposable income. Other quality of life elements include the ability to visit family and friends

living in Cold Bay as well as other villages along the Alaska Peninsula. Additional quality of life factors include the ability to schedule school events that involve travel for scholastic or sporting competitions.

As noted in the Corps 2003 DEIS, the school population in Cold Bay borders on the threshold of not having enough students to qualify for state financial assistance. In the event the student threshold is not met, and without a safe, reliable and cost effective mode of transportation to get to the substantially larger school system in King Cove, students in Cold Bay likely will be limited to home schooling. The lack of local education services in Cold Bay likely will increase adverse effects on efforts by the Service and other Federal and State entities to recruit someone with school age children to move to Cold Bay.

Finally, the quality of life for residents and workers in Cold Bay will be enhanced by the access to cheaper home heating and vehicle fuel and groceries in King Cove. Cold Bay residents also will have improved access to the more extensive education opportunities at the King Cove School.

#### CONCLUSION

**KCG OVERARCHING CONCLUSION ON THE ABILITY OF A ROAD, HOVERCRAFT OR FERRY TRANSPORTATION SYSTEM THAT MEETS THE PURPOSE AND NEED FOR A SAFE, RELIABLE, AND AFFORDABLE WAY TO TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT --**

- **ALTERNATIVE 2 AND ALTERNATIVE 3 INDEPENDENTLY HAVE MAJOR BENEFICIAL IMPACTS FOR THE COMBINED PURPOSE AND NEED. THE OTHER ALTERNATIVES DO NOT MEET THE PURPOSE AND NEED AND DO NOT SOLVE THE PROBLEMS WHICH THE LAND EXCHANGE IS INTENDED TO SOLVE.**

**SUBSISTENCE**

Subsistence is an important component of the quality of life for local residents throughout Alaska. This is especially true for qualified local residents of the City of Cold Bay and the City of King Cove. ANILCA requires Federal actions to consider the effect of a proposed project and alternatives on the use of and access to subsistence resources. In addition, Federal ownerships are required to give priority for qualified local residents for use of subsistence resources when there is insufficient resource to meet demands for commercial, sport, and subsistence harvest.

As a private land owner, the King Cove Corporation has an exclusive ability to control public access and thus eliminate competition. Contingent upon the Land Exchange being consummated, Subtitle E will result in both State and King Cove Corporation ownerships becoming Federal ownership as part of the National Wilderness Preservation System and National Wildlife Refuge System. These land ownership changes result in Federal management for access to and use of subsistence resources on 56,200 acres.

The Shareholders of the King Cove Corporation are volunteering to forego their exclusive ability to eliminate competition for subsistence resources on the 16,126 acres like any other private landowner. In return, the residents of King Cove will have a safe, reliable, and affordable road connecting the City of King Cove to the Cold Bay Airport.

Subtitle E prohibits the Secretary of the Interior from imposing any restriction on subsistence related to waterfowl hunting as part of the public interest finding. See Section 6402(d)(2)(B).

Table 11. Summary of Resources on 16,126 Acres of King Cove Ownership Identified in Subtitle E. <sup>a</sup>

<b>KING COVE CORPORATION OWNERSHIPS THAT WILL BECOME OR REMAIN PART OF THE NATIONAL WILDLIFE REFUGE SYSTEM -- 16,126 ACRES (see Table 13 of details)</b>	
<p><b>6,100 ACRES WETLANDS</b>  <b>5 MILES OF SHORELINE ON MORETENSENS LAGOON</b>  <b>5 MILES OF SHORELINE ON KINZAROF LAGOON</b>  <b>8 MILES OF SHORELINE ON COLD BAY</b>  <b>16 MILES OF SHORELINE ON FRESH WATER LAKES</b>  <b>ADJOINING LAKES RETAINED BY STATE</b>  <b>10,400 ACRES HIGH DENSITY USE HABITAT FOR TUNDRA SWANS</b>  <b>3,000 ACRES OF MEDIUM DENSITY USE HABITAT FOR TUNDRA SWANS</b>  <b>1,000 ACRES OF LOW DENSITY USE HABITAT FOR TUNDRA SWANS</b></p>	<p><b>A 26 YEAR AVERAGE OF 2.5 TO 2.8 DOCUMENTED TUNDRA SWAN PAIRS AND NESTS</b>  <b>14, 200 ACRES OF HIGH DENSITY USE AND MIGRATION HABITAT FOR CARIBOU</b>  <b>6,400 ACRES OF HIGH DENSITY USE HABITAT FOR BROWN BEAR</b>  <b>8,500 ACRES OF MEDIUM DENSITY USE HABITAT FOR BROWN BEAR</b>  <b>400 ACRES OF HIGH DENSITY DENNING HABITAT FOR BROWN BEAR</b>  <b>2 CABINS USED BY SHAREHOLDERS OF THE KING COVE CORPORATION</b>  <b>WARM SPRINGS WITH CULTURAL VALUE</b></p>

<sup>a</sup> INCLUDES 5,430 ACRES OF VALID SELECTION WITHIN THE IZEMBOK WILDERNESS. RESOURCES ASSOCIATED WITH 5,430 ACRES OF LAND THE KING COVE CORPORATION WILL ACQUIRE FROM THE ALASKA PENINSULA NWR UNDER ALTERNATIVES 1, 4, AND 5 IS SPECULATIVE.

DEIS Section 4 describes the estimated effect on access to and use of subsistence resources in the general area with some additional information on the lands identified in Subtitle E.

<p><b>CONCLUSIONS</b></p> <p><b>THE KCG CONCURS WITH THE DEIS FINDING THAT THE EFFECT ON SUBSISTENCE WITH THE LAND EXCHANGE AND A ROAD IN EITHER THE SOUTHERN OR CENTRAL ROAD CORRIDOR WILL</b></p> <ul style="list-style-type: none"> <li>• <b>HAVE AN OVERALL AND CUMULATIVE EFFECT OF NEGLIGIBLE TO MINOR</b></li> <li>• <b>NOT HAVE A SIGNIFICANT RESTRICTION ON SUBSISTENCE USE</b></li> <li>• <b>HAVE NO REASONABLY FORESEEABLE FUTURE ACTION THAT WILL AFFECT SUBSISTENCE IN THE PROJECT AREA</b></li> </ul>
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Subtitle E requires the 4,282 acres water and submerged land comprising Izembek Lagoon with its 2,300 acres of eelgrass beds and 17 miles of intertidal shoreline be added to the Izembek State Game Refuge. This will be highly beneficial to the long-term management of subsistence fish and wildlife resources because Kinzarof Lagoon will be managed in the same manner as are the fish and wildlife resources in the Izembek Lagoon Complex. Contingent upon the land exchange being consummated, the Alaska Legislature has approved the addition of the Kinzarof Lagoon to the Izembek State Game Refuge.

Table 12. Subsistence Resources of the Kinzarof Lagoon added to the Izembek State Game Refuge under Subtitle E.

<p><b>SUBSISTENCE RESOURCES ON KINZAROF LAGOON THAT WILL BE ADDED TO THE IZEMBEK STATE GAME REFUGE UNDER THE LAND EXCHANGE WITH A ROAD IN THE SOUTHERN ROAD CORRIDOR OR CENTRAL THE ROAD CORRIDOR</b></p>
<p><b>4,242 ACRES OF WATER</b>  <b>2,300 ACRES OF EELGRASS BEDS</b>  <b>17 MILES OF SHORELINE WITH ASSOCIATED INTERTIDAL WETLANDS</b>  <b>LANDS ADJOINING KINZAROF LAGOON WILL BE PART OF THE IZEMBEK WILDERNESS</b></p>

The KCG recognizes that an additional 41,887 acres on the State Parcel has important subsistence resources that will be added to the National Wildlife Refuge System. These lands and the 1,619 acre Sitkinak Island Parcel are not areas of traditional subsistence use by the local residents of King Cove or Cold Bay.

Table 13. Subsistence Resources Used by the King Cove Corporation Shareholders that are Directly Involved with the Proposed Land Exchange

<p><b>MORTENSENS LAGOON PARCEL -- 8,092 ACRES</b></p> <p><b>2,920 ACRES OF WETLANDS</b>  <b>5 MILES OF SHORELINE ADJOINING MORTENSENS LAGOON</b>  <b>1.5 MILES OF SHORELINE ADJOINING COLD BAY</b>  <b>6.8 MILES OF SHORELINE ADJOINING FRESH WATER LAKES</b>  <b>4,000 ACRES OF HIGH DENSITY USE HABITAT FOR TUNDRA SWANS</b>  <b>3,000 ACRES OF MEDIUM DENSITY USE HABITAT FOR TUNDRA SWANS</b>  <b>1,000 ACRES OF LOW DENSITY USE HABITAT FOR TUNDRA SWAN</b>  <b>DOCUMENTED 26 YEAR ANNUAL AVERAGE OF 1.9 TO 2.1 TUNDRA SWAN AND NEST SITES</b>  <b>8,092 ACRES OF HIGH DENSITY WINTER USE AND MIGRATION FOR CARIBOU</b>  <b>8,092 ACRES OF MEDIUM DENSITY USE BY BROWN BEAR</b>  <b>2 CABINS AT THE ENTRANCE TO MORTENSENS LAGOON USED BY KING COVE CORPORATION SHAREHOLDERS</b></p> <p style="text-align: center;"><b>KINZAROF LAGOON PARCEL -- 2,604 ACRES</b></p> <p><b>1,235 ACRES WETLAND</b>  <b>5 MILES OF SHORELINE ON KINZAROF LAGOON</b>  <b>7 MILES OF SHORELINE ON COLD BAY</b>  <b>2,604 ACRES OF HIGH DENSITY USE HABITAT FOR TUNDRA SWANS</b>  <b>DOCUMENTED 26 YEAR ANNUAL AVERAGE OF 0.1 TUNDRA SWAN PAIRS AND NEST NESTS</b>  <b>2,604 ACRES HIGH DENSITY WINTER USE AND MIGRATION HABITAT FOR CARIBOU</b>  <b>2.400 ACRES HIGH DENSITY USE HABITAT FOR BROWN BEAR</b>  <b>200 ACRES MEDIUM DENSITY USE HABITAT FOR BROWN BEAR</b></p> <p style="text-align: center;"><b>KING COVE CORPORATIN RELINQUISHED SELECTION -- 5,430 ACRES</b></p> <p><b>1,917 ACRES OF WETLANDS</b>  <b>5.8 MILES OF SHORELINE ADJOINING FRESH WATER LAKES</b>  <b>3,800 ACRES HIGH DENSITY USE HABITAT FOR TUNDRA SWANS</b>  <b>DOCUMENTED 26 YEAR ANNUAL AVERAGE OF 0.5 TO 0.6 TUNDRA SWAN PAIRS AND NESTS</b>  <b>3,500 ACRES HIGH DENSITY WINTER USE AND MIGRATION HABITAT FOR CARIBOU</b>  <b>4,800 ACRES OF HIGH DENSITY USE HABITAT OF BROWN BEAR</b>  <b>200 ACRES OF MEDIUM DENSITY USE HABITAT FOR BROWN BEAR</b>  <b>400 ACRES HIGH DENSITY DENNING HABITAT FOR BROWN BEAR</b>  <b>WARM SPRINGS WITH CULTURAL VALUE</b></p>
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ATVs also are traditionally used for access via roads and trails by local subsistence users. The Service has indicated that details on the design of a road will be considered only if the Secretary of the Interior finds the land exchange is in the public interest. Both the Southern and Central Road Corridors involving existing public and subsistence access routes which will require breaks for continued motorized access on existing trails used by sport hunters and by subsistence users. The legal requirement for traditional subsistence access is not recognized in the DEIS.

### RECOMMENDATIONS

THE KCG RECOMMENDS --

THE RECORD OF DECISION ADDRESS HOW BEST TO CONTINUE TO PROVIDE LEGAL MOTORIZED ACCESS TO SUBSISTENCE RESOURCES FOR LEGAL ACCESS BY THE GENERAL PUBLIC ON EXISTING MOTORIZED ACCESS SHOWN IN DEIS FIGURE 3.3-19

- 20. ANILCA, SECTION 811(A) ASSURES LOCAL RESIDENTS ENGAGED IN SUBSISTENCE USES HAVE REASONABLE ACCESS TO SUBSISTENCE RESOURCES ON FEDERAL LANDS.
- 21. SECTION 811(B) AUTHORIZES REASONABLE ACCESS TO SUBSISTENCE RESOURCES, SUBJECT TO REASONABLE REGULATION, BY TRADITIONAL MEANS INCLUDING SNOWMACHINES, MOTORBOATS, AIRPLANES, AND OTHER TRADITIONAL MEANS OF SURFACE TRANSPORTATION.
- 22. A ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR THE SERVICE CONCLUDED WILL "SIGNIFICANTLY RESTRICT SUBSISTENCE USES" OR RESTRICT ACCESS TO SUBSISTENCE RESOURCES BY TRADITIONAL MEANS WITHOUT SOME MEANS OF ACCESS TO EXISTING ROADS/TRAILS USED FOR TRADITIONAL SUBSISTENCE ACCESS.

### SUMMARY

THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR HAS SIMILAR EFFECTS TO LOCAL SUBSISTENCE USERS AND THE GENERAL PUBLIC. HOWEVER, THE

- SOUTHERN ROAD CORRIDOR WILL HAVE A LESSER EFFECT ON FUTURE SUBSISTENCE USE OF CARIBOU SINCE MORE OF THE CARIBOU MIGRATION ROUTE WILL REMAIN IN ITS EXISTING CONDITION WITH SEVERAL ROADS/TRAILS COMPLETELY INTERSECTING THE MIGRATION ROUTE TO AND FROM THE CALVING AREAS TO THE EAST OF THE IZEMBEK REFUGE.
- SOUTHERN ROAD CORRIDOR WILL INTERSECT FEWER EXISTING MOTORIZED TRAVEL ROUTES THAT WILL REQUIRE SOME BREAKS IN THE BOLLARD-CHAIN BARRIER ON BOTH SIDES OF THE ROAD TO ALLOW CONTINUED LEGAL ACCESS TO THE SHORES OF THE IZEMBEK LAGOON COMPLEX AND TO THE FRESH WATER LAKES IN THE PINTAIL LAKE AREA.

### CONCLUSION

THE KCG CONCLUDES --

- A ROAD CONSTRUCTED IN THE SOUTHERN ROAD CORRIDOR WILL HAVE THE LEAST NEGATIVE EFFECT ON SUBSISTENCE USE IN THE PROJECT AREA SINCE IT CROSSES FEWER EXISTING ROADS/TRAILS USED FOR TRADITIONAL ACCESS. ON BALANCE THE KCG CAN SUPPORT THE CENTRAL ROAD CORRIDOR PROVIDED TRADITIONAL SUBSISTENCE ACCESS IS MAINTAINED.

## WETLANDS

The FEIS, Record of Decision, and the Secretary of the Interior are required to evaluate the mitigation effect from the loss of wetlands as a result of the construction, operation, and maintenance of a road in the Southern Road Corridor and a road in the Central Road Corridor. See Subtitle E, Section 6403. (e)(4). Based on the information evaluated in the DEIS, there will be a positive net benefit to protection of wetlands as part of the National Wildlife Refuge System and as part of the National Wilderness Preservation System.

**General** -- Under Alternatives 2 or 3, the National Wildlife Refuge System will have a net gain of 13,650 acres of wetlands, of which up to 3,152 acres will be added to or retained in the RAMSAR designation as Wetlands of International Importance. Alternatives 2 and 3 will result in the addition of the 4,282 acres of water and submerged land and 17 miles of intertidal wetlands including 2,300 acres of eelgrass habitat to the Izembek State Game Refuge and be managed in the same manner as the State owned waters and eelgrass habitats in the Izembek Lagoon Complex. Also added to the National Wildlife Refuge System under Alternative 2 or 3, an estimated 3 miles of shoreline on the Bering Sea, 9 miles on Cold Bay, 5 miles on Mortensens Lagoon, 5 miles on Kinzarof Lagoon, and 10.4 miles of shoreline on fresh water lakes retained in State ownership. The Service will transfer to the State 2 miles of shoreline on the Gulf of Alaska, 2.5 miles on Sitkinak Lagoon and 2.5 miles on the intertidal waterway on Sitkinak Island. Under Alternatives 1, 4, and 5 the King Cove Corporation will receive title to the 5,430 acres that will be relinquished under Alternatives 2 and 3. This parcel contains 1,917 acres of wetlands in the Izembek Wilderness that may also be designated as RAMSAR wetlands. The King Cove Corporation will receive title to 5,430 acres on non-wilderness Federal ownership in the Alaska Peninsula NWR. The acreage and value of the replacement wetlands are speculative, but definitely lower in value than the unique wetlands in the Izembek Wilderness. See Table 13 for the acreages of wetlands and miles of shorelines for each parcel.

Under Alternative 2, the Southern Road Corridor will transfer to the State up to 13 acres of wetlands with an estimated 3.8 acres of wetland filled. The estimated acreages of wetlands are less than the approximately 18 acres of wetlands filled in the conceptual alignment identified in the Corps 2003 EIS. Concurrently, the loss of up to 13 acres of wetlands on Federal land will be offset by a net gain of 13,650 acres of wetlands added to the National Wildlife Refuge System plus the 4,282 acres of wetlands and 2,300 acres of eelgrass beds in Kinzarof Lagoon that will be added to the Izembek State Game Refuge. It is recognized that the King Cove Corporation will select other non-wilderness land from the Alaska Peninsula NWR. The acreage and value of these wetlands is speculative, but will not equal the loss of 1,917 acres of unique wetlands within the King Cove Corporation Relinquished Parcel. The overall ratio of wetlands gained to wetlands lost under Alternative 2 is 1,379 acres of wetlands to 1 acre of wetland.

Under Alternative 3, the Central Road Corridor will transfer to the State up to 9 acres of wetlands with an estimated 2.4 acres of wetland filled. Concurrently, the loss of up to 9 acres of wetlands on Federal land will be offset by a net gain of 13,654 acres of wetlands added to the National Wildlife Refuge System plus the 4,282 acres of wetlands and 2,300 acres of eelgrass beds in Kinzarof Lagoon that will be added to the Izembek State Game Refuge. It is recognized that the King Cove Corporation will select other non-wilderness land from the Alaska Peninsula NWR. The acreage and value of these wetlands is speculative, but will not equal the loss of 1,917 acres of unique wetlands within the King Cove Corporation Relinquished Parcel. The overall ratio of wetlands gained to wetlands lost under Alternative 3 is 2,749 acres of wetlands to 1 acre of wetland.

Alternatives 1, 4 and 5 will result in a net loss of 1,917 acres of unique wetlands located in the Izembek National Wildlife Refuge when the pending selection by the King Cove Corporation is consummated.

#### CONCLUSIONS

THE KCG CONCLUDES THERE WILL BE A SIGNIFICANT POSITIVE EFFECT TO HIGH VALUE WETLANDS AS A DIRECT RESULT OF CONSUMMATING THE LAND EXCHANGE AND CONSTRUCTION OF A ROAD AS ENVISIONED IN SUBTITLE E --

- THE NET VALUE OF APPROXIMATELY 13,650 ACRES OF WETLANDS AND ASSOCIATED SHORELINES ADDED TO, OR RETAINED IN, THE NATIONAL WILDLIFE REFUGE SYSTEM IS SIGNIFICANTLY GREATER THAN THE LOSS OF UP TO 3.8 ACRES OF WETLANDS FILLED UNDER ALTERNATIVE 2 OR ALTERNATIVE 3.
- THE NET VALUE OF 11,723 ACRES OF WETLANDS AND ASSOCIATED SHORELINES THAT WILL BE ADDED TO, OR RETAINED IN, THE NATIONAL WILDERNESS PRESERVATION SYSTEM WILL BE AT LEAST EQUAL TO AND MOST CERTAINLY GREATER THAN THE LOSS OF UP TO 2.7 ACRES OF WETLANDS IN THE IZEMBOK WILDERNESS UNDER ALTERNATIVE 2 OR ALTERNATIVE 3.
- THE NET VALUE OF UP TO 3,152 ACRES OF WETLANDS AND ASSOCIATED SHORELINES DESIGNATED AS RAMSAR WETLANDS THAT WILL BE ADDED TO, OR RETAINED IN, THE NATIONAL WILDERNESS PRESERVATION SYSTEM IS GREATER THAN THE LOSS OF UP TO 2.7 ACRES OF WETLANDS THAT WILL BE FILLED IN THE IZEMBOK WILDERNESS UNDER ALTERNATIVE 2 OR ALTERNATIVE 3.
- 4,282 ACRES OF WATER AND SUBMERGED LAND AND 2,300 ACRES OF EELGRASS WETLANDS AND 17 MILES OF INTERTIDAL SHORELINE USED BY THOUSANDS OF WATERFOWL IN KINZAROF LAGOON WILL BE ADDED THE IZEMBOK STATE GAME REFUGE WITH THE SAME PROTECTION OF STATE OWNED WATERS, SUBMERGED LAND, AND EELGRASS WETLANDS IN THE IZEMBOK LAGOON COMPLEX.

THE KCG CONCLUDES ALTERNATIVES 1, 4, AND 5 WILL HAVE A SIGNIFICANT NEGATIVE EFFECT TO UNIQUE, HIGH VALUE WETLANDS AS A DIRECT RESULT OF NOT CONSUMMATING THE LAND EXCHANGE AS ENVISIONED BY SUBTITLE E --

- 1,917 ACRES OF WETLANDS WILL BE REMOVED FROM THE NATIONAL WILDLIFE REFUGE SYSTEM.
- 1,917 ACRES OF UNIQUE WETLANDS WILL BE REMOVED FROM THE NATIONAL WILDERNESS PRESERVATION SYSTEM.
- 4,282 ACRES OF WATER AND 2,300 ACRES OF EELGRASS AND 17 MILES OF INTERTIDAL SHORELINE USED BY TENS OF THOUSANDS OF WATERFOWL WILL NOT BE ADDED THE IZEMBOK STATE GAME REFUGE.

Table 14. Acres of Wetlands and Miles of Shoreline Habitat Removed and Added/Retained to the National Wildlife Refuge System, State Ownership, and King Cove Corporation Ownership for each Alternative.

PARCEL	NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT <i>(ALTERNATIVE 1)</i>	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR <i>(ALTERNATIVE 2)</i>	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR <i>(ALTERNATIVE 3)</i>	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT <i>(ALTERNATIVE 4)</i>	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY <i>(ALTERNATIVE 5)</i>
<b>STATE PARCELS</b>					
• WETLANDS	NONE	8,571 ACRES	8,571 ACRE	NONE	NONE
• RAMSAR <sup>a</sup>	NONE	NONE	NONE	NONE	NONE
• WILDERNESS	NONE	NONE	NONE	NONE	NONE
• SHORELINE <sup>b</sup>	NONE	3 MILES ON BERING SEA -6.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP	3 MILES ON BERING SEA 6.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP	NONE	NONE
<b>MORTENSENS LAGOON</b>					
• WETLANDS	NONE	2,920 ACRES	2,920 ACRES	NONE	NONE
• RAMSAR <sup>a</sup>	NONE	NONE	NONE	NONE	NONE
• WILDERNESS	NONE	NONE	NONE	NONE	NONE
• SHORELINE <sup>b</sup>	NONE	5 MILES ON MORTENSENS LAGOON 1.5 MILES ON COLD BAY 4.6 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP	5 MILES ON MORTENSENS LAGOON 1.5 MILES ON COLD BAY 4.6 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP	NONE	NONE

<b>KINZAROF LAGOON (UPLANDS)</b> <ul style="list-style-type: none"> <li>• WETLANDS</li> <li>• RAMSAR <sup>a</sup></li> <li>• WILDERNESS</li> <li>• SHORELINE <sup>b</sup></li> </ul>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>1,235 ACRES</p> <p>1,235 ACRES</p> <p>1,235 ACRES</p> <p>5 MILES ON KINZAROF LAGOON 7 MILES ON COLD BAY</p>	<p>1,235 ACRES</p> <p>1,235 ACRES</p> <p>1,235 ACRES</p> <p>5 MILES ON KINZAROF LAGOON 7 MILES ON COLD BAY</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>
<b>KING COVE CORPORATON RELINQUISHED SELECTION</b> <ul style="list-style-type: none"> <li>• WETLANDS <sup>c</sup></li> <li>• RAMSAR <sup>a</sup></li> <li>• WILDERNESS</li> <li>• SHORELINE <sup>b</sup></li> </ul>	<p>1,917 ACRES</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>1,917 ACRES</p> <p>1,917 ACRES</p> <p>1,917 ACRES</p> <p>5.8 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</p>	<p>1,917 ACRES</p> <p>1,917 ACRES</p> <p>1,917 ACRES</p> <p>5.8 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</p>	<p>1,917 ACRES</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>1,917 ACRES</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>
<b>SITKINAK ISLAND</b> <ul style="list-style-type: none"> <li>• WETLANDS</li> <li>• RAMSAR <sup>a</sup></li> <li>• WILDERNESS</li> <li>• SHORELINE <sup>b</sup></li> </ul>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>980 ACRES</p> <p>NONE</p> <p>NONE</p> <p>2 MILES ON GULF OF ALASKA 2.5 MILES ON SITKINAK LAGOON 2.5 MILES ON INTERTIDAL WATERWAY</p>	<p>980 ACRES</p> <p>NONE</p> <p>NONE</p> <p>2 MILES ON GULF OF ALASKA 2.5 MILES ON SITKINAK LAGOON 2.5 MILES ON INTERTIDAL WATERWAY</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>

<b>KINZAROF LAGOON (WATER &amp; SUBMERGED LAND)</b>						
• <b>WATER</b>	<b>NONE</b>	<b>4,282ACRES</b>	<b>4,282ACRES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>EELGRASS</b>	<b>NONE</b>	<b>2,300 ACRES</b>	<b>2,300 ACRES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>RAMSAR <sup>a</sup></b>	<b>NONE</b>	<b>17 MILES</b>	<b>17 MILES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>SHORELINE <sup>d</sup></b>	<b>NONE</b>	<b>17 MILES</b>	<b>17 MILES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
<b>ROAD CORRIDOR <sup>g</sup></b>						
• <b>WETLANDS</b>	<b>NONE</b>	<b>UP TO 13 ACRES</b>	<b>UP TO 9 ACRES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>RAMSAR <sup>a c</sup></b>	<b>NONE</b>	<b>UP TO 13 ACRES</b>	<b>UP TO 9 ACRES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>WILDERNESS</b>	<b>NONE</b>	<b>UP TO 13 ACRES</b>	<b>UP TO 13 ACRES</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>SHORELINE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>

<sup>a</sup> WETLANDS OF INTERNATIONAL IMPORTANCE DESIGNATED UNDER THE RAMSAR CONVENTION IN 1971 FOR THE WATERSHED OF THE IZEMBEK LAGOON COMPLEX. IN 1986 THE RAMSAR DESIGNATION WAS EXPANDED TO THE INCLUDE THE KINZAROF LAGOON WATERSHED

<sup>b</sup> MILES OF SHORELINE ABOVE MEAN HIGH TIDE

<sup>c</sup> WETLANDS EXTENDED INTO THE KINZAROF LAGOON IN 1986 DO NOT APPLY TO LANDS OWNED OR SELECTED BY THE KING COVE CORPORATION WITHIN THE BOUNDARIES OF THE IZEMBEK NWR WERE NOT CONSIDERED RAMSAR WETLANDS BY THE SERVICE IN THE CORPS 2003 EIS..

<sup>d</sup> MILES OF INTERYDAL SHORELINE BELOW MEAN HIGH TIDE

Table 15. Net Gain or Loss in Acres of Wetlands and Miles of Shoreline Habitat Added or Retained to the National Wildlife Refuge System, State Ownership, and King Cove Corporation Ownership.

OWNERSHIP	NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY
	(ALTERNATIVE 1)	(ALTERNATIVE 2)	(ALTERNATIVE 3)	(ALTERNATIVE 4)	(ALTERNATIVE 5)
<b>NET GAIN OR LOSS -- REFUGE</b>					
• WETLANDS	-1,917 ACRES	+13,563 ACRES	+13,554 ACRES	-1,917 ACRES	-1,917 ACRES
• RAMSAR <sup>a c</sup>	--1,917 ACRES	+3,152 ACRES	+3,152 ACRES	--1,917 ACRES	--1,917 ACRES
• WILDERNESS	-1,917 ACRES	+11,710 ACRES	+11,714 ACRES	-1,917 ACRES	-1,917 ACRES
• SHORELINE <sup>b</sup>	-5.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP	+3 MILES BERING SEA +9 MILES ON GULF OF ALASKA +9 MILES ON COLD BAY +5 MILES ON MORTENSENS LAGOON +5 MILES ON KINZAROF LAGON +10.4 MILES OF FRESH WATER LAKES	+3 MILES ON BERING SEA +9 MILES ON GULF OF ALASKA +8 MILES ON COLD BAY +5 MILES ON MORTENSENS LAGOON +5 MILES ON KINZAROF LAGOON +10.4 MILES OF FRESH WATER LAKES	-5.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP	-5.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP
<b>STATE</b>					
1. WETLANDS	NONE	-7,563ACRES	-7,582 ACRES	NONE	NONE
2. •RAMSAR <sup>a</sup>	NONE	NONE	NONE	NONE	NONE
3. WILDERNESS	NONE	NON3	NONE	NONE	NONE
4. SHORELINE <sup>d</sup>	NONE	-3 MILES ON BERING SEA 10.4 MILES ON FRESH WATER LAKES	-3 MILES ON BERING SEA 10.4 MILES ON FRESH WATER LAKES	NONE	NONE

<b>KING COVE CORPORATION</b>	<b>+1,917 ACRES</b>	<b>-6,072 ACRES</b>	<b>-6,072 ACRES</b>	<b>+1,917 ACRES</b>	<b>+1,917 ACRES</b>
• <b>WETLANDS <sup>c</sup></b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>RAMSAR <sup>a</sup></b>	<b>+5.8 MILES ON FRESH WATER LAKES</b>	<b>-5 MILES ON MORTENSENS LAGOON</b>	<b>-5 MILES ON MORTENSENS LAGOON</b>	<b>+5.8 MILES ON FRESH WATER LAKES</b>	<b>+5.8 MILES ON FRESH WATER LAKES</b>
• <b>SHORELINE <sup>d</sup></b>	<b>RETAINED IN STATE OWNERSHIP</b>	<b>-8 MILES ON COLD BAY</b>	<b>-8 MILES ON COLD BAY</b>	<b>RETAINED IN STATE OWNERSHIP</b>	<b>RETAINED IN STATE OWNERSHIP</b>
		<b>-5 MILES ON KINZAROF LAGOON</b>	<b>-5 MILES ON KINZAROF LAGOON</b>		
		<b>-10.4 MILES ON FRESH WATER LAKES</b>	<b>-10.4 MILES ON FRESH WATER LAKES</b>		
		<b>RETAINED IN STATE OWNERSHIP</b>	<b>RETAINED IN STATE OWNERSHIP</b>		
<b>IZEMBEK STATE GAME REFUGE WATER</b>	<b>NONE</b>	<b>+4,282 ACRES INC. 2,300 ACRES EELGRASS HABITAT</b>	<b>+4,282 ACRES INC. 2,300 ACRES EELGRASS HABITAT</b>	<b>NONE</b>	<b>NONE</b>
<b>RAMSAR <sup>c</sup></b>	<b>NONE</b>	<b>+4,282 ACRES INC. 2,300 ACRES EELGRASS HABITAT</b>	<b>+4,282 ACRES INC. 2,300 ACRES EELGRASS HABITAT</b>	<b>NONE</b>	<b>NONE</b>
<b>WILDERNESS</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
<b>SHORELINE <sup>d</sup></b>	<b>NONE</b>	<b>+17 MILES OF INTERTIDAL SHORELINE ON KINZAROF LAGOON</b>	<b>+17 MILES OF INTERTIDAL SHORELINE ON KINZAROF LAGOON</b>	<b>NONE</b>	<b>NONE</b>

The DEIS seems to imply the bollard-chain barrier systems will be ineffective with Local residents or visitors illegally use motorized vehicles to damage wetlands. The KCG requested the Service to indicate the number of violations issued by the Service. The Service has not provided any information to support the magnitude of illegal motorized use in the Izembek Wilderness since its establishment in 1980. Likewise, the Service has not indicated any problem with illegal ATV use in the Izembek Wilderness that adjoins the Frosty Peak Road which was "cherry stemmed" from the Izembek Wilderness and other trails shown in DEIS Figure 3.3-19. None of these roads in the Izembek NWR have physical barriers. The KCG comments on December 23, 2011 again raised this issue with the Service. Attachment 4 contains photos shows the existing Service method to mark an existing motorized route at the boundary of the Izembek Wilderness in the vicinity of Pintail Lakes.

***Wetlands of International Importance*** -- The Land Exchange/Road Corridor DEIS (Section 3.2.2.2) notes the formal designation under the RAMSAR Convention included 101,313 acres of wetlands owned by the State of Alaska and the Federal Government. DEIS Figure 3.2-2 shows the RAMSAR designation was essentially restricted to the watershed of the Izembek Lagoon Complex and extended off-shore into the Bering Sea. Uplands in this designation were in Federal ownership as part of the Izembek NWR. State owned off-shore marine waters, subsea land as well as the State owned waters and submerged land and intertidal shoreline of the Izembek Lagoon Complex were designated pursuant to State Law as the Izembek State Game Refuge which also overlapped Federal land in the Izembek watershed. No private lands were then, or now, associated with the original RAMSAR designation.

In 1986 the DEIS reports the RAMSAR designation was expanded to 416,207 acres. e.g. all land and water within the exterior boundaries of the Izembek NWR. The 1986 expansion appears to have included substantial acreages owned by the King Cove Corporation as well as the 5,430 acres pending transfer to the King Cove Corporation that Subtitle E identifies as the "Relinquishment" parcel.

The Corps 2003 EIS resulted in the authorization and construction of about 6 miles of new road and a hovercraft terminal and associated facilities located on privately owned King Cove Corporation land within the boundaries of the Izembek NWR. The Service fully participated in the 2003 EIS and subsequent Corps project modifications and was asked to verify the extent, if any, that designated RAMSAR wetlands were directly or indirectly involved. The Service did not advise the Corps that any of the wetlands and associated habitats located on the private lands of the King Cove Corporation within the Izembek NWR were part of a RAMSAR designation. Subsequently, the Service Refuge Manager completed several "compatibility determinations" under ANCSA Section 22(g) for the sale of Service owned gravel used for the construction and maintenance of the road and hovercraft terminal on the King Cove Corporation lands within the Izembek NWR.

The Service has been requested by KCG to provide any documentation to indicate coordination and consultation with the King Cove Corporation or other local residents prior to the 1986 expansion of the RAMSAR designation. The DEIS also notes the Service is obligated to report to the RAMSAR International Convention on any change to wetlands in a RAMSAR designation. The KCG has asked for copies of any notifications the Service has made as a direct result of Service or other entities activities that affected the character of wetlands in the watershed of the Izembek Lagoon Complex.

To date no documentation has been provided to support the 1986 expansion or any coordination with the King Cove Corporation and the two Tribes under processes to fulfill the Secretary of the Interiors Trust Responsibility.

The DEIS indicates approximately 3 miles of the Southern Road Corridor will be located in the watershed of the Izembek Lagoon Complex vs. approximately 5 miles for the Central Road. With a maximum of 3.8 acres of wetlands filled the overall effect on RAMSAR wetlands is of low intensity, permanent duration, local, and unique intensity. See DEIS Section 4.1.3. To the extent the 1986 RAMSAR designation includes the King Cove Corporation lands, the DEIS does not address the loss of 1,917 acres

of unique wetlands that will be removed from the Izembek Wilderness under Alternatives 1, 4, and 5. Likewise the addition or retention of these unique wetlands together with the 1,235 acres of wetlands on the Kinzarof Lagoon Parcel that would become "unique" when added to the Izembek Wilderness under Alternatives 2 and 3 are not clearly evaluated in the DEIS. The DEIS does not consider the effect of adding 4,282 acres of State waters and submerged land including 2,300 acres of eelgrass and 17 miles of intertidal shoreline that would be added to the Izembek State Game Refuge under Alternative 2 or Alternative 3 and whether these significant habitats for migratory birds would or would not be managed as designated RAMSAR wetlands.

#### CONCLUSIONS

##### THE KCG CONCLUDES --

- THE TRANSFER OF UP TO 13 ACRES OF RAMSAR WETLANDS WITH AN ESTIMATED UP TO 3.8 ACRES OF FILL TO STATE OWNERSHIP UNDER ALTERNATIVE 2 WILL HAVE A NEGLIGIBLE TO MINOR EFFECT WITHIN THE CONTEXT OF THE OVERALL WETLAND DISTRIBUTION AND FUNCTION OF WETLANDS ON FEDERAL AND STATE OWNERSHIPS IN THE IZEMBEK.
- THE TRANSFER OF UP TO 9 ACRES OF RAMSAR WETLANDS WITH AN ESTIMATED UP TO 2.4 ACRES OF FILL TO STATE OWNERSHIP UNDER ALTERNATIVE 3 WILL BE NEGLIGIBLE TO MINOR EFFECT WITHIN THE CONTEXT OF THE OVERALL WETLAND DISTRIBUTION AND FUNCTION OF WETLANDS ON FEDERAL AND STATE OWNERSHIPS IN THE PROJECT AREA.
- THE ADDITION OF 1,235 ACRES OF WETLANDS LOCATED ON THE KINZAROF LAGOON PARCEL AND RETENTION OF THE 1,917 ACRES OF RAMSAR WETLANDS ON THE KING COVE CORPORATION RELINQUISHED SELECTION UNDER ALTERNATIVES 2 AND 3 WILL HAVE A MAJOR POSITIVE EFFECT SINCE THE 3,152 ACRES WILL BE PART OF THE IZEMBEK WILDERNESS AS PROSPECTIVE RAMSAR WETLANDS
- 1,917 ACRES OF RAMSAR WETLANDS WILL BE REMOVED FROM THE IZEMBEK WILDERNESS UNDER ALTERNATIVES 1, 4, AND 5 WILL HAVE A DIRECT AND NEGATIVE EFFECT TO THE RAMSAR WETLAND DESIGNATION.

**Shoreline Habitats** -- The interface between marine waters and fresh water streams and lakes provide key habitats that are important. The KCG has consistently asked the Service to identify the approximate miles of shoreline involved with the lands identified in Subtitle E; and again in the KCG comments to the Service on December 23, 2011. The DEIS still does not quantify this important and unique habitat. The following KCG estimated miles of shoreline based on the graphics included in the DEIS and are presented as a relative index the Service should consider as the FEIS is prepared.

Alternatives 2 and 3 will change the ownership of an estimated 39 miles of unique shoreline habitats. The transfer of the Sitkinak Island Parcel to the State of Alaska involves approximately 7 miles of shoreline giving a net of approximately 32 miles of unique shoreline habitat added to the National Wildlife Refuge System.

Table 16. Miles of Shoreline habitats Removed and Added/Retained Under Alternative 2 or Alternative 3.

PARCEL	MILES OF SHORELINE
<b><i>REMOVED FROM THE NATIONAL WILDLIFE REFUGE SYSTEM</i></b>	
SITKINAK ISLAND (GULF OF ALASKA)	2
SITKINAK ISLAND (SITKINAK LAGOON)	2.5
SITKINAK ISLAND (INTERTIDAL WATERWAY)	2.5
<b><i>SUBTOTAL</i></b>	<b><i>7.0</i></b>
<b><i>ADDITION/RETENTION IN THE NATIONAL WILDLIFE REFUGE SYSTEM</i></b>	
STATE OF ALASKA (BERING SEA)	3
STATE OF ALASKA (FRESH WATER LAKES RETAINED IN STATE OWNERSHIP)	6.8
MORTENSENS LAGOON (MORTENSENS LAGOON )	5
MORTENSENS LAGOON (COLD BAY)	1.5
MORTENSENS LAGOON (FRESH WATER LAKES RETAINED IN STATE OWNERSHIP)	4.6
KINZAROF LAGOON (KINZAROF LAGOON SHORELINE)	5
KINZAROF LAGOON (COLD BAY SHORELINE)	7
KING COVE CORPORATION RELINQUISHED SELECTION (FRESH WATER LAKES RETAINED IN STATE OWNERSHIP)	5.8
<b><i>SUBTOTAL</i></b>	<b><i>38.7</i></b>
<b><i>NET GAIN OF SHORELINE IN THE NATIONAL WILDLIFE REFUGE SYSTEM</i></b>	<b><i>31.7</i></b>

#### CONCLUSIONS

THE KCG OVERARCHING CONCLUSION ON THE EFFECT OF THE LAND EXCHANGE CONTEMPLATED IN SUBTITLE E ON WETLANDS AND ASSOCIATED SHORELINES, WETLANDS DESIGNATED AS RAMSAR WETLANDS, AND WETLANDS IN THE NATIONAL WILDERNESS PRESREVATION SYSTEM ARE --

- BOTH ALTERNATIVE 2 AND ALTERNATIVE 3 WILL HAVE THE SAME OVERALL EFFECT TO WETLANDS BY ADDING APPROXIMATELY 17,900 ACRES OF HIGH VALUE WETLANDS AND 32 MILES OF ASSOCIATED SHORELINE TO THE NATIONAL WILDLIFE REFUGE SYSTEM INCLUDING 11,723 ACRES THAT WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM.
- BOTH ALTERNATIVE 2 AND ALTERNATIVE 3 WILL HAVE THE SAME OVERALL EFFECT TO WETLANDS BY POTENTIALLY ADDING, OR RETAINING EXISTING FEDERAL OWNERSHIP OF APPROXIMATELY 3,152 ACRES OF RAMSAR DESIGNATED WETLANDS; ALL OF WHICH WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM.
- BOTH ALTERNATIVE 2 AND ALTERNATIVE 3 WILL ADD 4,282 ACRES OF WATERS AND SUBMERGED LAND WITH 2,300 ACRES OF EELGRASS HABITATS IN STATE OWNERSHIPS TO THE IZEMBEK STATE GAME REFUGE WITH EVEN GREATER PROTECTION THAN THE IZEMBEK LAGOON COMPLEX SINCE KINZAROF LAGOON WILL BE COMPLETELY SURROUNDED BY WILDERNESS.
- ALTERNATIVES 1, 4, AND 5 WILL RESULT IN A DIRECT AND PERMANENT LOSS OF 1,917 ACRES OF UNIQUE WETLANDS THAT MAY OR MAY NOT ALSO BE DESIGNATED AS RAMSAR WETLANDS OF INTERNATIONAL IMPORTANCE.

#### RECOMMENDATIONS

KCG RECOMMENDS --

- 23. THE SERVICE AND THE CORPS CLEARLY INDICATE THE EXTENT DESIGNATED RAMSAR WETLANDS OF INTERNATIONAL IMPORTANCE ARE OR ARE NOT DIRECTLY, INDIRECTLY, OR CUMULATIVELY EFFECTED BY ALL THE LAND EXCHANGE AND ITS ALTERNATIVES.
- 24. THE SERVICE AND THE CORPS SELECT ALTERNATIVE 2 (LAND EXCHANGE/ROAD IN THE SOUTHERN ROAD CORRIDOR) AS THE PREFERRED ALTERNATIVE AND THE MOST ENVIRONMENTALLY PREFERABLE ALTERNATIVE IN PROVIDING A SAFE, RELIABLE, AFFORDABLE WAY TO TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT, BECAUSE THE SOUTHERN ROAD CORRIDOR HAS THE FEWEST MILES OF ROAD LOCATED IN THE WATERSHED OF THE IZEMBEK LAGOON COMPLEX WHILE HAVING THE SAME NET BENEFIT OF ADDING OR RETAINING FEDERAL OWNERSHIP OF HIGH VALUE WETLANDS.

## WILDERNESS

Subject to completion of this EIS and a public interest finding by the Secretary of the Interior the Congress in Subtitle E has --

- **STATUTORIALLY APPROVED THE CONCEPT THAT A LIMITED AMOUNT OF LAND CAN BE REMOVED FROM THE IZEMBEK WILDERNESS AND TRANSFERRED TO THE STATE OF ALASKA FOR THE CONSTRUCTION, OPERATION AND MAINTENANCE OF A SAFE, RELIABLE, AND AFFORDABLE ROAD CONNECTING THE CITY OF KING COVE TO THE COLD BAY AIRPORT IN RETURN FOR THE STATE AND KING COVE CORPORATION LANDS APPROVED IN SUBTITLE E.**
- **DETERMINED THAT THE STATE PARCEL COMPRISING 31,887 ACRES QUALIFIES FOR ADDITION TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM AS A PART OF THE NATIONAL WILDLIFE SYSTEM.**
- **SPECIFIED THAT THE KING COVE CORPORATION RELINQUISH 5,430 ACRES OF LAND THAT OTHERWISE WILL BE REMOVED FROM THE IZEMBEK WILDERNESS.**

The Land Exchange with a road in the Southern Road Corridor will transfer 131 unique acres of Federal ownership in the Izembek Wilderness to the State in Alaska. The result of Alternative 2 on Wilderness will be the net gain in 49,790 acres of Wilderness with unique values.

The Land Exchange with a road in the Central Road Corridor will transfer 152 unique acres of Federal ownership in the Izembek Wilderness to the State in Alaska. The result of Alternative 3 on Wilderness will be the net gain in 49,769 acres of Wilderness with unique values.

Alternatives 1, 4, and 5 will result in the transfer of 5,430 acres of the Izembek Wilderness with unique values to the King Cove Corporation. The result of Alternatives 1, 4, and 5 will be a net loss of 5,430 unique acres from the Izembek Wilderness.

## CONCLUSIONS

**THE KCG OVERARCHING CONCLUSIONS ON THE EFFECT OF THE LAND EXCHANGE ON THE NATIONAL WILDERNESS PRESERVATION SYSTEM AUTHORIZED BY SUBTITLE E ARE --**

- **ALTERNATIVES 2 AND 3 ARE ESSENTIALLY THE SAME AND WILL HAVE A POSITIVE EFFECT ON THE NATIONAL WILDERNESS PRESERVATION SYSTEM.**
- **ALTERNATIVE 2 HAS THE FEWEST ACRES REMOVED FROM THE IZEMBEK WILDERNESS.**
- **ALTERNATIVES 1, 4, AND 5 WILL HAVE A SIGNIFICANT MAJOR AND PERMANENT NEGATIVE EFFECT ON WILDERNESS SINCE IT WILL TRANSFER 5,430 ACRES OF THE IZEMBEK WILDERNESS TO THE KING COVE CORPORATION.**

**RECOMMENDATIONS**

**THE KCG RECOMMENDS THE SERVICE AND THE CORPS --**

- **25. SELECT EITHER ALTERNATIVE 2 (LAND EXCHANGE/ROAD IN THE SOUTHERN ROAD CORRIDOR) OR ALTERNATIVE 3 (LAND EXCHANGE/ROAD IN THE CENTRAL ROAD CORRIDOR) AS THE PREFERRED ALTERNATIVE AND THE MOST ENVIRONMENTALLY PREFERABLE ALTERNATIVE TO PROVIDE A SAFE, RELIABLE, AFFORDABLE WAY TO TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT.**

Table 17. Summary Comparison of Acres of Wilderness Added or Removed from the National Wilderness Preservation System under Subtitle E.

PARCEL	NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT <i>(ALTERNATIVE 1)</i>	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR <i>(ALTERNATIVE 2)</i>	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR <i>(ALTERNATIVE 3)</i>	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT <i>(ALTERNATIVE 4)</i>	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY <i>(ALTERNATIVE 5)</i>
STATE PARCELS <sup>a</sup>	NONE	+41,887 ACRES	+41,887 ACRES	NONE	NONE
MORTENSENS LAGOON	NONE	NONE	NONE	NONE	NONE
KINZAROF LAGOON <sup>b</sup>	NONE	+2604 ACRES	+2604 ACRES	NONE	NONE
KING COVE CORPORATION RELINQUISHED SELECTION <sup>c</sup>	-5,430 ACRES	+5,430 ACRES	+5,430 ACRES	-5,430 ACRES	-5,430 ACRES
SITKINAK ISLAND	NONE	NONE	NONE	NONE	NONE
ROAD CORRIDOR	NONE	133 ACRES	152 ACRES	NONE	NONE
<b>TOTAL NET GAIN OR LOSS</b>	<b>-5,430 ACRES</b>	<b>+49,780 ACRES</b>	<b>+49,769 ACRES</b>	<b>-5,430 ACRES</b>	<b>-5,430 ACRES</b>

<sup>a</sup> NEW WILDERNESS

<sup>b</sup> ADDED TO THE IZEMBEK NWR WILDERNESS

<sup>c</sup> RETAINED IN THE IZEMBEK NWR WILDERNESS

### EMPEROR GOOSE AND BRANT

Subtitle E requires the waters of Kinzarof Lagoon to be added to the Izembek State Game Refuge. DEIS Figure 3.2-12 shows the Kinzarof Lagoon, islands in the mouth of Kinzarof Lagoon and a series of bars and spits that extend southwesterly along the shore of Cold Bay from the mouth of Mortensens Lagoon as high density abundance for staging and for wintering habitat both for the Emperor Goose and for Brant. The Kinzarof Lagoon Parcel will transfer King Cove Corporation ownership of the islands in the mouth of Kinzarof Lagoon and the spits and bars southwesterly from the mouth of Kinzarof Lagoon. The State Parcel, Mortensens Lagoon, King Cove Corporation Relinquished Selection as well as the Southern Road Corridor and the Central Road Corridor is designated as little or no use for either for Emperor Goose or for Brant.

Subtitle E will designate all lands surrounding Kinzarof Lagoon as Wilderness giving greater protection to the shoreline of Kinzarof Lagoon than is now given the Izembek Lagoon Complex which has a public boat launch visitor facilities and a number of motorized access points to the shoreline.

Some Emperor Goose and Brant fly between the two high density staging/wintering habitats of Kinzarof Lagoon and the Izembek Lagoon Complex. The Southern Road Corridor is generally located in the Kinzarof Lagoon watershed. The Central Road Corridor tends to be located along the watershed divide between the Izembek Lagoon and Kinzarof Lagoon which may increase the potential for traffic to have a concurrent effect on Emperor Goose and Brant populations on both the Izembek Lagoon Complex and the Kinzarof Lagoon. The DEIS suggests Alternative 2 and Alternative 3 will have the direct effect of increasing hunting for Emperor Goose and Brant populations. The KCG agrees the distribution of waterfowl hunters will likely change. However, there is no supporting analysis that either Alternative 2 or alternative 3 will have a direct effect of increasing the average of about 1,100 waterfowl "visitor days" of use (see DEIS Table 3.3-52) or the number of waterfowl harvested by sports or subsistence hunters.

#### CONCLUSIONS

THE KCG OVERARCHING CONCLUSIONS ON THE EFFECT OF ALTERNATIVE 2 AND ALTERNATIVE 3 ON EMPEROR GOOSE AND BRANT ARE --

BOTH THE SOUTHERN ROAD CORRIDOR AND THE CENTRAL ROAD CORRIDOR WILL HAVE THE SAME GENERAL EFFECT ON POPULATIONS OF EMPEROR GOOSE AND BRANT USING THE IZEMBEK LAGOON COMPLEX AND KINZAROF LAGOON.

ADDITION OF KINZAROF LAGOON TO THE IZEMBEK STATE GAME REFUGE WILL ASSURE THAT 4,282 ACRES OF STATE WATERS AND SUBMERGED LAND WITH 2,300 ACRES OF EELGRASS HABITAT AND WITH 17 MILES OF INTERTIDAL SHORELINE WILL HAVE A MAJOR POSITIVE BENEFIT TO THE LONG-TERM PROTECTION AND MANAGEMENT OF HIGH DENSITY STAGING AND WINTERING HABITAT FOR EMPEROR GOOSE AND FOR BRANT.

ADDITION OF THE ISLANDS IN THE MOUTH OF KINZAROF LAGOON AND THE BARS AND SPITS EXTENDING SOUTHWESTERLY FROM THE MOUTH OF KINZAROF LAGOON (BOTH PART OF THE KINZAROF LAGOON PARCEL) WILL HAVE A MAJOR POSITIVE BENEFIT TO THE LONG-TERM PROTECTION AND MANAGEMENT OF HIGH DENSITY STAGING AND WINTERING HABITAT FOR EMPEROR GOOSE AND FOR BRANT.

#### RECOMMENDATIONS

THE KCG RECOMMENDS THE SERVICE AND THE CORPS --

26. SELECT ALTERNATIVE 2 (LAND EXCHANGE/ROAD IN THE SOUTHERN ROAD CORRIDOR) OR ALTERNATIVE 3 (LAND EXCHANGE/ROAD IN THE CENTRAL ROAD CORRIDOR) AS THE PREFERRED ALTERNATIVE AND THE MOST ENVIRONMENTALLY PREFERABLE ALTERNATIVE TO PROVIDE A SAFE, RELIABLE, AFFORDABLE WAY TO TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT, BECAUSE THE SOUTHERN ROAD CORRIDOR HAS THE FEWEST MILES OF ROAD IN THE IZEMBEK LAGOON COMPLEX AND IS FURTHER FROM THE SHORE OF THE IZEMBEK LAGOON COMPLEX.

## TUNDRA SWAN

As a Cooperator in the preparation of the overall DEIS the KCG has relied on the Service to assure the DEIS contained an accurate description of the habitat use areas and fish and wildlife populations that would be effected by the land exchange envisioned by Subtitle E. The KCG confidence that the DEIS would provide accurate descriptions of key resources that become critical elements of the effects evaluations described in Chapter 4 was substantially lowered because the Service made unilateral changes in the effects evaluation for the Tundra Swan based on internal Service comments that are without scientific merit and extremely biased when viewed at the regional scale on the basis of of Service swan observations for 26 years. When asked why Tundra Swan nest data were not included in the DEIS, the Service initially replied this information is "sensitive" but did provide 26 years of Tundra Swan observations in a GIS format as well as the centerline of the two road alignment in GIS format. The City of King Cove entered into a contract with ABR, Inc.--Environmental Research & Services to provide a scientific analysis of the Service owned Tundra Swan observations. The results of that effort "*Review of Impact Assessments for Terrestrial Wildlife in the Izembek National Wildlife Refuge Land Exchange/Road Corridor DEIS*" May 2012 is Attachment xx.

### RECOMMENDATIONS

#### THE KCG STRONGLY RECOMMENDS --

- 27. THE SERVICE REVIEW THE CONCLUSIONS PRESENTED IN THE ABR MAY 2012 REPORT AND AS APPROPRIATE INCORPORATE THE RESULTS.
- 28. THE ALASKA DEPARTMENT OF FISH AND GAME AND THE SERVICE SIT DOWN WITH ABR TO DISCUSS THE CONCLUSIONS IN THE ATTACHED REPORT.

The Tundra Swan is considered by the Service to be a very special bird species associated with the Izembek NWR and the Alaska Peninsula NWR because this is the only year around resident population in Alaska. The DEIS notes there are 500-600 Tundra Swans wintering on the 75 mile-long segment of the lower Alaska Peninsula and Unimak Island area depicted on DEIS Figure 3.2-13. The population of Tundra Swan in the area appears to be highly variable with an annual population ranging from about 50 birds to more than 250 with breeding pairs ranging from less than 50 to about 80 pairs. DEIS Figure 3.2-13 indicates the majority of the land surrounding the Izembek Lagoon Complex, False Pass, and along the Bering Sea extending to the east of the State Parcel is classified as high density abundance for Tundra Swans. No Tundra Swan abundance was identified on the Sitkinak Parcel. The Service loosely applies the term "Izembek National Wildlife Refuge" as sometimes it means the actual boundaries of the Izembek National Wildlife Refuge as established by ANILCA and sometimes it means a combination of the Izembek National Wildlife Refuge, part of the Alaska Peninsula National Wildlife Refuge, and Alaska Maritime National Wildlife Refuge described in the 1998 Service Land Protection Plan as the "Izembek National Wildlife Refuge Complex." This blurred description of geographic areas is confusing,

especially when trying to set the "extent" of an effect as being "local" or "regional" or "extended" (DEIS p. 4-3).

Under Alternatives 2 and 3 a net of approximately 12,100 acres of high density use habitat and 3,000 acres of medium density Tundra Swan use habitat and 19,900 acres of low density Tundra Swan use habitat for a total net gain of 35,000 acres of Tundra Swan habitats and nest sites.

The 1998 Service Land Protection Plan for the Izembek Refuge Complex (Figure A-5) shows known swan nests. This Figure is incorporated as DEIS Figure 3.2-13 without attribution or identification that the circular outlines are the same as the "1 mile buffer around known [Tundra Swan] nest site". The DEIS notes the Southern Road Corridor "crosses through high density swan habitat with numerous observations of pairs and nests occurring in close proximity...." A similar description is provided for the Central Road Corridor.

If the Service had done a scientific analysis of the 26 years of its own observations of Tundra Swan in a superimposed on the Service owned center line for the Southern Road Corridor and the same for the Central Road Corridor should have disclosed an analysis to the effect:

#### RECOMMENDATIONS

- 29. "USING ALL 26 YEARS OF SERVICE DATA FOR TUNDRA SWANS WITHIN 1,500 METERS OF THE CENTERLINE OF THE SOUTHERN ROAD ALIGNMENT, AN AVERAGE OF 2.1 (5.7 PERCENT) OBSERVED BREEDING PAIRS IN A GIVEN YEAR WITHIN THE BOUNDARIES OF THE IZEMBEK NATIONAL WILDLIFE REFUGE ESTABLISHED BY ANILCA. WHEN USING THE CURRENT SERVICE METHOD TO DERIVE ESTIMATED BREEDING PAIRS THESE DATA INDICATE AN AVERAGE OF 2.5 BREEDING PAIRS (6.1 PERCENT) COULD OCCUR. ANNUAL OBSERVATIONS SHOW THE NUMBER OF NESTING SWAN PAIRS AND NESTS RANGE FROM NONE TO 6 PAIRS WITH AN ANNUAL AVERAGE OF 0.7 OR 0.9 DEPENDING ON THE METHODOLOGY USED."
- 30. "USING ALL 26 YEARS OF SERVICE DATA FOR TUNDRA SWANS WITHIN 1,500 METERS OF THE CENTERLINE OF THE CENTRAL ROAD ALIGNMENT, AN AVERAGE OF 1.9 (5.3 PERCENT) OBSERVED BREEDING PAIRS IN A GIVEN YEAR WITHIN THE BOUNDARIES OF THE IZEMBEK NATIONAL WILDLIFE REFUGE ESTABLISHED BY ANILCA. WHEN USING THE CURRENT SERVICE METHOD TO DERIVE ESTIMATED 1.9 BREEDING PAIRS THESE DATA INDICATE AN ANNUAL AVERAGE OF 2.0 BREEDING PAIRS (5.1 PERCENT) COULD OCCUR."

Likewise, The DEIS does not disclose the number of Swan pairs or nests associated with the land exchange and masks actual data with terms such as the 5,430 acres of land in the Izembek Wilderness King Cove Corporation would relinquish would "likely" provide nesting and foraging habitat for Tundra Swan (DEIS p. 4-31) when DEIS Figure 3.2-13 clearly shows there is an estimated 3,800 acres of high density abundance habitat for Tundra Swan. Accordingly, the DEIS should have disclosed an analysis to the effect:

**RECOMMENDATIONS**

- 31. "THE 26 YEARS OF TUNDRA SWAN OBSERVATIONS FOR THE 5,430 ACRES THE KING COVE CORPORATION WILL RELINQUISH HAS APPROXIMATELY 3,800 ACRES OF UNIQUE HIGH DENSITY ABUNDANCE HABITAT THAT ARE USED BY UP TO 3 PAIRS AND NESTS COMBINED WITH MOST YEARS HAVING NONE. ANNUAL OBSERVATIONS SHOW THE NUMBER OF NESTING SWAN PAIRS AND NESTS RANGE FROM NONE TO 3 PAIRS WITH AN ANNUAL AVERAGE OF 0.5 OR 0.6 DEPENDING ON THE METHODOLOGY USED. UNDER ALTERNATIVES 1, 4, AND 5, THIS UNIQUE TUNDRA SWAN HABITAT WILL BE REMOVED FROM THE IZEMBEK WILDERNESS."
- 32. "THE 26 YEARS OF TUNDRA SWAN OBSERVATIONS FOR THE 8,092 ACRES OF THE MORTENSENS LAGOON PARCEL HAS AN ESTIMATED 4,000 ACRES OF HIGH DENSITY ABUNDANCE, 3,000 ACRES OF MEDIUM DENSITY ABUNDANCE AND 1,100 ACRES OF LOW DENSITY ABUNDANCE HABITATS AND NESTS FOR TUNDRA SWAN. ANNUAL OBSERVATIONS SHOW THE NUMBER OF NESTING SWAN PAIRS AND NESTS RANGE FROM NONE TO 9 PAIRS WITH AN ANNUAL AVERAGE OF 1.9 OR 2.1 DEPENDING ON THE METHODOLOGY USED."

The DEIS Figure 3,2-13 shows the Kinzarof Lagoon Parcel has 2.604 acres of high density abundance habitat for Tundra Swan and nests. Accordingly, the DEIS should have disclosed an analysis to the effect

**RECOMMENDATIONS**

- 33. "THE 26 YEARS OF TUNDRA SWAN OBSERVATIONS FOR THE 2,604 ACRES OF THE KINZAROF LAGOON PARCEL HAS AN ESTIMATED 2,604 ACRES OF HIGH DENSITY ABUNDANCE AND NESTS FOR TUNDRA SWAN. ANNUAL OBSERVATIONS SHOW THE NUMBER OF NESTING SWAN PAIRS AND NESTS RANGE FROM NONE TO 1 PAIR WITH AN ANNUAL AVERAGE OF 0.1 UNDER EITHER METHODOLOGY."

DEIS Figure 3.2-13 shows the State Parcel as blank ("no data available") which turns out to be incorrect as Tundra Swan data provided at the request of the KCG has 26 years of data for the State Parcel. Projecting the habitat lines to the east and west of the State Parcel with consideration to the land cover data shown in DEIS Figure 2.3-2 and the actual Tundra Swan pairs/nest data shown in Figure 4 of the attached ABR report, an estimated 20,700 acres of high and medium density abundance for Tundra Swans. Accordingly, the DEIS should have disclosed an analysis to the effect:

**RECOMMENDATIONS**

- 34. "THE 26 YEARS OF TUNDRA SWAN OBSERVATIONS FOR THE 41,887 ACRES OF THE STATE PARCEL INDICATES THE KINZAROF LAGOON PARCEL HAS AN ESTIMATED 1,900 ACRES OF HIGH DENSITY ABUNDANCE AND 18,800 ACRES OF MEDIUM DENSITY ABUNDANCE AND NESTS FOR TUNDRA SWAN. ANNUAL OBSERVATIONS SHOW THE NUMBER OF NESTING SWAN PAIRS AND NESTS RANGE FROM NONE TO 7 PAIRS WITH AN ANNUAL AVERAGE OF 3.5 OR 3.8 PAIRS AND NESTS DEPENDING ON THE METHODOLOGY. THIS TUNDRA SWAN HABITAT IS CONSIDERED UNIQUE SINCE THE ENTIRE 41,887 ACRES WILL BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM. IT IS NOTED THAT THE 20,700 ACRES OF TUNDRA SWAN HABITAT AND NESTS ARE NOT LOCATED WITHIN THE EXTERNAL BOUNDARIES OF THE IZEMBEK NATIONAL WILDLIFE REFUGE AND HAS MORE ACREAGE AND MORE SWAN PAIRS AND NESTS THAN THE COMBINED TOTAL OF ALL THE OTHER PARCELS."

When applying the DEIS effect criteria and taking into account the totality of the permanent ownership changes that will occur with the Land Exchange and a Southern Road Corridor or the Northern Road Corridor (Alternatives 2 and 3, respectively) and Alternatives 1, 4, and 5:

#### RECOMMENDATIONS

##### THE KCG RECOMMENDS --

- 35. THE FEIS NEEDS TO RE-EVALUATE THE DEIS CONCLUSIONS, IN PARTICULAR THE KCG EVALUATION BASED ON 26 YEARS OF SERVICE OBSERVATIONS OF TUNDRA SWAN PAIRS AND NESTS

##### CONCLUSIONS

##### THE KCG CONCLUDES THERE WILL HAVE A --

- MAJOR POSITIVE EFFECT BY ADDING A TOTAL OF 35,200 ACRES AND AN AVERAGE ANNUAL NUMBER OF 6.0 TO 6.7 PAIRS OF SWANS AND NESTS OF UNIQUE TUNDRA SWAN USE AND NESTING HABITAT TO THE NATIONAL WILDLIFE REFUGE SYSTEM.
- MAJOR POSITIVE EFFECT BY ADDING A TOTAL OF 27,100 ACRES OF UNIQUE TUNDRA SWAN HABITAT AND AN AVERAGE ANNUAL NUMBER OF SWAN PAIRS AND NESTS FROM 4.1 TO 4.6 DEPENDING ON THE METHODOLOGY USED THAT WILL BECOME PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM
- NEGLIGIBLE TO MINOR EFFECT FOR THE 2 PAIRS OF SWAN PAIRS/NESTS WITHIN THE OVERALL TUNDRA SWAN HABITAT/NESTS IN THE IZEMBEK NATIONAL WILDLIFE REFUGE AND THE 75 MILELONG AREA EXAMINED IN THE SERVICE 1998 LAND PROTECTION PLAN FOR THE IZEMBEK NATIONAL WILDLIFE REFUGE COMPLEX.
- NEGLIGIBLE TO MAJOR EFFECT ON THE 0.5 TO 0.6 PAIRS OF TUNDRA SWAN PAIRS AND NESTS FROM THE IZEMBEK NATIONAL WILDERNESS PRESERVATION SYSTEM UNDER ALTERNATIVES 1, 4, AND 5.

Table 18. Summary Comparison of Acres of Tundra Swan Use and Nest Sites Added or Removed from the National Wilderness Preservation System under Subtitle E.

PARCEL	NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT  (ALTERNATIVE 1)	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR  (ALTERNATIVE 2)	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR  (ALTERNATIVE 3)	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT  (ALTERNATIVE 4)	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY  (ALTERNATIVE 5)
<b>STATE PARCELS</b>					
• HIGH	NONE	1,900 ACRES 3 MILES ON BERING SEA 6.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP	1,900 ACRES 3 MILES ON BERING SEA 6.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP	NONE	NONE
• MEDIUM	NONE	NONE	NONE	NONE	NONE
• LOW	NONE	18,800 ACRES	18,800 ACRES	NONE	NONE
• NEST SITES	NONE	26 YEAR AVERAGE OF 3.5 TO 3.9 SWAN PAIRS/NESTS PER YEAR	26 YEAR AVERAGE OF 3.5 TO 3.9 SWAN PAIRS/NESTS PER YEAR	NONE	NONE
<b>MORTENSENS LAGOON</b>					
• HIGH	NONE	4,000 ACRES 5 MILES ON MORTENSENS LAGOON 4.6 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP 1.5 MILES ON COLD BAY	4,000 ACRES 5 MILES ON MORTENSENS LAGOON 4.6 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP 1.5 MILES ON COLD BAY	NONE	NONE
• MEDIUM	NONE	3,000 ACRES	3,000 ACRES	NONE	NONE
• LOW	NONE	1,100 ACRES	1,100 ACRES	NONE	NONE
• NEST SITES	NONE	26 YEAR AVERAGE OF 1.9 TO 2.1 SWAN PAIRS/NESTS PER YEAR	26 YEAR AVERAGE OF 1.9 TO 2.1 SWAN PAIRS/NESTS PER YEAR	NONE	NONE

<p><b>KINZAROF LAGOON</b></p> <ul style="list-style-type: none"> <li>• <b>HIGH</b></li>   <li>• <b>MEDIUM</b></li> <li>• <b>LOW</b></li> <li>• <b>NEST SITES</b></li> </ul>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>2,604 ACRES 7 MILES ON COLD BAY, 5 MILES ON KINZAROF LAGOON</p> <p>NONE</p> <p>NONE</p> <p>26 YEAR AVERAGE OF 0.1 SWAN PAIRS/NESTS PER YEAR</p>	<p>2,604 ACRES 7 MILES ON COLD BAY, 5 MILES ON KINZAROF LAGOON</p> <p>NONE</p> <p>NONE</p> <p>26 YEAR AVERAGE OF 0.1 SWAN PAIRS/NESTS PER YEAR</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>
<p><b>KING COVE CORPORATION RELINQUISHED SELECTED LAND</b></p> <ul style="list-style-type: none"> <li>• <b>HIGH</b></li>   <li>• <b>MEDIUM</b></li> <li>• <b>LOW</b></li> <li>• <b>NEST SITES</b></li> </ul>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>3,800 ACRES 5.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</p> <p>NONE</p> <p>NONE</p> <p>26 YEAR AVERAGE OF 0.5 TO 0.6 SWAN PAIRS/NESTS PER YEAR</p>	<p>3,800 ACRES 5.8 MILES ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</p> <p>NONE</p> <p>NONE</p> <p>26 YEAR AVERAGE OF 0.5 TO 0.6 SWAN PAIRS/NESTS PER YEAR</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>
<p><b>SITKINAK ISLAND</b></p>	<p>NO DATA</p>	<p>NO DATA</p>	<p>NO DATA</p>	<p>NO DATA</p>	<p>NO DATA</p>
<p><b>KINZAROF LAGOON <sup>A</sup></b></p> <ul style="list-style-type: none"> <li>• <b>HIGH</b></li> <li>• <b>MEDIUM</b></li> <li>• <b>LOW</b></li> <li>• <b>NEST SITES</b></li> </ul>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p> <p>NONE</p> <p>NONE</p>

<b>ROAD CORRIDOR</b>					
• <b>HIGH</b>	<b>NONE</b>	<b>201 ACRES</b>	<b>227 ACRES</b>	<b>NONE</b>	<b>NONE</b>
• <b>MEDIUM</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>LOW</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
• <b>NEST SITES</b>	<b>NONE</b>	<b>26 YEAR AVERAGE OF 2.1 TO 2.5 SWAN PAIRS/NESTS PER YEAR WITHIN 1,500 METER BUFFER FROM ROAD CENTERLINE</b>	<b>26 YEAR AVERAGE OF 1.9 TO 2.0 SWAN PAIRS/NESTS PER YEAR WITHIN 1,500 METER BUFFER FROM ROAD CENTERLINE</b>	<b>NONE</b>	<b>NONE</b>

Table 19. Summary of Net Gain or Loss of Acres of Tundra Swan Use and Nest Sites Added or Removed from the National Wilderness Preservation System under Subtitle E.

OWNERSHIP	NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT (ALTERNATIVE 1)	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR (ALTERNATIVE 2)	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR (ALTERNATIVE 3)	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT (ALTERNATIVE 4)	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY (ALTERNATIVE 5)
<b>NET GAIN/LOSS -- NATIONAL REFUGE SYSTEM</b> <ul style="list-style-type: none"> <li data-bbox="240 653 337 674">• HIGH</li> <li data-bbox="240 1178 375 1199">• MEDIUM</li> <li data-bbox="240 1503 334 1524">• LOW</li> <li data-bbox="240 1566 391 1587">• NEST SITES</li> </ul>	<p data-bbox="464 653 613 789">-3,800 ACRES -5.8 MILES SHORELINE OF FRESH WATER SHORELINE</p> <p data-bbox="505 1178 570 1199">NONE</p> <p data-bbox="505 1503 570 1524">NONE</p> <p data-bbox="505 1566 570 1587">NONE</p>	<p data-bbox="667 653 816 1146">+12,300 ACRES +3 MILES OF SHORELINE ON BERING SEA +8.5 MILES SHORELINE ON ON COLD BAY +MILES OF SHORELINE ON KINZAROF LAGOON + 17.2 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</p> <p data-bbox="667 1178 816 1461">+3,000 ACRES +3 MILES OF SHORELINE ON BERING SEA +6.8 MILES OF SHORELINE ON FRESH WATER LAKES IN RETAINED STATE OWNERSHIP</p> <p data-bbox="667 1503 816 1671">+19,900 ACRES  + ANNUAL AVERAGE OF 6.0 TO 6.7 SWAN PAIRS/NESTS</p>	<p data-bbox="870 653 1019 1146">+12,300 ACRES +3 MILES OF SHORELINE ON BERING SEA +8.5 MILES SHORELINE ON ON COLD BAY +MILES OF SHORELINE ON KINZAROF LAGOON + 17.2 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</p> <p data-bbox="870 1178 1019 1461">+3,000 ACRES +3 MILES OF SHORELINE ON BERING SEA +6.8 MILES OF SHORELINE ON FRESH WATER LAKES IN RETAINED STATE OWNERSHIP</p> <p data-bbox="870 1503 1019 1671">+19,900 ACRES  + ANNUAL AVERAGE OF 6.0 TO 6.7 SWAN PAIRS/NESTS</p>	<p data-bbox="1073 653 1222 789">-3,800 ACRES -5.8 MILES SHORELINE OF FRESH WATER SHORELINE</p> <p data-bbox="1114 1178 1179 1199">NONE</p> <p data-bbox="1114 1503 1179 1524">NONE</p> <p data-bbox="1114 1566 1179 1587">NONE</p>	<p data-bbox="1276 653 1425 789">-3,800 ACRES -5.8 MILES SHORELINE OF FRESH WATER SHORELINE</p> <p data-bbox="1317 1178 1382 1199">NONE</p> <p data-bbox="1317 1503 1382 1524">NONE</p> <p data-bbox="1317 1566 1382 1587">NONE</p>

<p><b>NET GAIN/LOSS STATE</b></p> <ul style="list-style-type: none"> <li>• <b>HIGH</b></li>   <li>• <b>MEDIUM</b></li> <li>• <b>LOW</b></li> <li>• <b>NEST SITES</b></li> </ul>	<p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p>	<p><b>-10,404 ACRES 8.5 MILES OF SHORELINE ON COLD BAY -5 MILES ON SHORELINE OF KINZAROF LAGOON -5 MILES OF SHORELINE ON MORETENSENS LAGOON -10.4 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</b></p> <p><b>-3,000 ACRES</b></p> <p><b>-1,000 ACRES</b></p> <p><b>- AVERAGE ANNUAL 3.5 TO 3.9 TUNDRA SWAN PAIRS/NESTS</b></p>	<p><b>-10,404 ACRES 8.5 MILES OF SHORELINE ON COLD BAY -5 MILES ON SHORELINE OF KINZAROF LAGOON -5 MILES OF SHORELINE ON MORETENSENS LAGOON -10.4 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</b></p> <p><b>-3,000 ACRES</b></p> <p><b>-1,000 ACRES</b></p> <p><b>- AVERAGE ANNUAL 3.5 TO 3.9 TUNDRA SWAN PAIRS/NESTS</b></p>	<p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p>	<p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p>
<p><b>NET GAIN/LOSS KING COVE CORPORATION <sup>B</sup></b></p> <ul style="list-style-type: none"> <li>• <b>HIGH</b></li>   <li>• <b>MEDIUM</b></li> <li>• <b>LOW</b></li> <li>• <b>NEST SITES</b></li> </ul>	<p><b>+3,800 ACRES +5.8 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>+ AVERAGE ANNUAL 0.5 TO 0.6 SWAN PAIRS/NESTS</b></p>	<p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p>	<p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>NOME</b></p>	<p><b>+3,800 ACRES +5.8 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>+ AVERAGE ANNUAL 0.5 TO 0.6 SWAN PAIRS/NESTS</b></p>	<p><b>+3,800 ACRES +5.8 MILES OF SHORELINE ON FRESH WATER LAKES RETAINED IN STATE OWNERSHIP</b></p> <p><b>NONE</b></p> <p><b>NONE</b></p> <p><b>+ AVERAGE ANNUAL 0.5 TO 0.6 SWAN PAIRS/NESTS</b></p>

## EAGLE NESTS

DEIS Figure 3.2-16 provides a partial disclosure of the location of Bald Eagle nest in the general area. Nests are shown only for the Mortensens Lagoon Parcel and for the two road alignments in the Blinn Lake tract that will be administratively transferred from the Alaska Peninsula NWR to the Izembek NWR under Alternatives 2 or 3. Eagle nest sites associated with the State Parcel or for Sitkinak Island Parcel are not shown. The DEIS does not clearly indicate whether the nest associated with the Mortensens Lagoon Parcel is or is not on King Cove Corporation ownership or if so, King Cove Land that will be transferred to the Alaska Peninsula NWR under either Alternative 2 or Alternative 3.

The KCG fully recognizes there are well established protections that have been developed under the provisions of the Bald Eagle Protection Act. The DEIS does not indicate these protections will not be effective in protecting Bald Eagles under either Alternative 2 or Alternative 3.

### CONCLUSIONS

#### THE KCG CONCLUDES --

- THE TWO EXISTING ROADS AROUND BLINN LAKE HAVE ESSENTIALLY THE SAME TERRAINL CHARACTER FOR CONSTRUCTING, OPERATING, AND MAINTAINING THE ROAD ENVISIONED BY SUBTITLE E.
- THE EXISTING ROAD ASSIGNED TO THE CENTRAL ROAD CORRIDOR IS SHORTER THAN THE ROAD ASSIGNED TO THE SOUTHERN ROAD CORRIDOR.
- EXCEPT FOR THE BALD EAGLE NEST AND THE LENGTH OF EACH SEGMENT, THE TWO EXISTING ROADS AROUND BLINN LAKE CROSS SIMILAR FISH, AND WILDLIFE RESOURCES.

### RECOMMENDATIONS

#### THE KCG RECOMMENDS –

- 36. THE FEIS SHOW THE NORTHERN EXISTING ROAD AROUND BLINN LAKE AS THE ENVIRONMENTALLY PREFERRED ROUTE FOR EITHER A ROAD CONSTRUCTED IN THE SOUTHERN ROAD CORRIDOR N A ROAD CONSTRUCTEED IN THE CENTRAL ROAD CORRIDOR BECAUSE IT IS SHORTER AND AVOIDS A KNOWN BALD EAGLE NEST.

**CARIBOU**

Alternative 2 and Alternative 3 will add about 50,586 acres of high density winter/migration habitat including about 36,000 acres of high density calving located in the State Parcel (DEIS Figures 3.2.21 and 3.2-22). All of the 36,000 acres of high density calving habitat will have maximum protection against future development because it will be managed as part of the National Refuge System as Wilderness. In total, Subtitle E will result in 42,764 acres of key caribou habitat which will be managed as Congressionally designated Wilderness. Although caribou hunting for sport or subsistence is presently prohibited, the long-term management object is to have a caribou population that will sustain both sport and subsistence harvests. The FEIS should address the effect of the land exchange on the management goal of having a caribou population in the area that supports a sustainable harvest for both sport and for subsistence purposes. The KCG has consistently requested the Service to describe the effect of the 50 miles of existing Service managed, public accessible roads that in several places completely intersects caribou migrations and local movements, most recently on December 23, 2011. To date, the KCG has not received any response.

The DEIS concludes a road located in either the Southern Road Corridor or the Central Road Corridor will have a positive effect by the virtue of adding of 36,000 acres of calving habitat with the summary overall effect as moderate unless caribou migration is interrupted. The potential for interrupting caribou migration was considered low, but if it occurred the effect will be major

Table 20. Summary Comparison of Acres of Caribou High Use Winter Range and Migration Habitat and High Density Calving Habitat Added or Removed from the National Wilderness Preservation System under Subtitle E. <sup>a</sup>

<p><b>PARCEL</b></p>	<p><b>NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT</b> <b>(ALTERNATIVE 1)</b></p>	<p><b>LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR</b> <b>(ALTERNATIVE 2)</b></p>	<p><b>LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR</b> <b>(ALTERNATIVE 3)</b></p>	<p><b>NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT</b> <b>(ALTERNATIVE 4)</b></p>	<p><b>NO LAND EXCHANGE WITH A CONCEPTUAL FERRY</b> <b>(ALTERNATIVE 5)</b></p>
<p><b>STATE PARCEL WINTER RANGE &amp; MIGRATION CORRIDOR</b></p> <ul style="list-style-type: none"> <li>• <b>HIGH USE WINTER RANGE &amp; MIGRATION</b></li> <li>• <b>HIGH DENSITY CALVING</b></li> </ul>	<p><b>NONE</b></p>	<p><b>36,000 ACRES<sup>b</sup></b></p>	<p><b>36,000 ACRES<sup>b</sup></b></p>	<p><b>NONE</b></p>	<p><b>NONE</b></p>

<p><b>MORTENSENS LAGOON WINTER RANGE &amp; MIGRATION CORRIDOR</b></p> <ul style="list-style-type: none"> <li>• <b>HIGH USE WINTER RANGE &amp; MIGRATION</b></li> <li>• <b>HIGH DENSITY CALVING</b></li> </ul>	<p>NONE</p> <p>NONE</p>	<p>8,092 ACRES</p> <p>NONE</p>	<p>8,092 ACRES</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p>
<p><b>KINZAROF LAGOON WINTER RANGE &amp; MIGRATION CORRIDOR</b></p> <ul style="list-style-type: none"> <li>• <b>HIGH USE WINTER RANGE &amp; MIGRATION</b></li> <li>• <b>HIGH DENSITY CALVING</b></li> </ul>	<p>NONE</p> <p>NONE</p>	<p>3,800 ACRES<sup>b</sup></p> <p>NONE</p>	<p>3,800 ACRES<sup>b</sup></p> <p>NONE</p>	<p>NONE</p> <p>NONE</p>	<p>NONE</p> <p>NONE</p>
<p><b>KING COVE CORPORATION RELINQUISHED SELECTED LAND WINTER RANGE &amp; MIGRATION CORRIDOR</b></p> <ul style="list-style-type: none"> <li>• <b>HIGH USE WINTER RANGE &amp; MIGRATION</b></li> <li>• <b>HIGH DENSITY CALVING</b></li> </ul>	<p>3,500 ACRES<sup>c</sup></p> <p>NONE</p>	<p>3,500 ACRES<sup>b</sup></p> <p>NONE</p>	<p>3,500 ACRES<sup>b</sup></p> <p>NONE</p>	<p>3,500 ACRES<sup>c</sup></p> <p>NONE</p>	<p>3,500 ACRES<sup>c</sup></p> <p>NONE</p>
<p><b>SITNINAK ISLAND PARCEL</b></p>	<p>NOT DISCUSSED</p>				
<p><b>KINZAROF LAGOON<sup>d</sup> WINTER USE &amp; MIGRATION CORRIDOR</b></p> <ul style="list-style-type: none"> <li>• <b>HIGH USE WINTER RANGE &amp; MIGRATION</b></li> <li>• <b>HIGH DENSITY CALVING</b></li> </ul>	<p>NONE</p> <p>NONE</p>				

<b>ROAD CORRIDOR</b> • <b>HIGH USE WINTER RANGE &amp; MIGRATION</b>	<b>NONE</b>	<b>201 ACRES</b>	<b>227 ACRES</b>	<b>NONE</b>	<b>NONE</b>
• <b>HIGH DENSITY CALVING</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>

<sup>a</sup> ACREAGE ESTIMATES ARE BASED ON DEIS FIGURE 3.2-22 WHICH REPRESENTS THE MOST RECENT SERVICE DATA INCORPORATED IN THE DEIS

<sup>b</sup> ACRES THAT WILL BE MANAGED AS WILDERNESS UNDER SUBTITLE E

<sup>c</sup> ACRES THAT WILL BE REMOVED FROM THE IZEMBЕК WILDERNESS UNDER ALTERNATIVES 1, 4, AND 5

<sup>d</sup> ACRES OF WATER AND SUBMERGED LAND ADDED TO THE IZEMBЕК STATE GAME REFUGE.

Table 21. Summary Net or Gain of Acres of Caribou High Use Winter Range and Migration Habitat and High Density Calving Habitat Added or Removed from the National Wilderness Preservation System under Subtitle E.

<b>OWNERSHIP</b>	<b>NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT (ALTERNATIVE 1)</b>	<b>LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERN ROAD CORRIDOR (ALTERNATIVE 2)</b>	<b>LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR (ALTERNATIVE 3)</b>	<b>NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT (ALTERNATIVE 4)</b>	<b>NO LAND EXCHANGE WITH A CONCEPTUAL FERRY (ALTERNATIVE 5)</b>
<b>NET GAIN/LOSS</b>					
<b>REFUGE SYSTEM WINTER RANGE &amp; MIGRATION CORRIDOR</b>					
• <b>HIGH USE WINTER RANGE &amp; MIGRATION</b>	<b>-3,500 ACRES</b>	<b>+51,191 ACRES</b>	<b>+51,165 ACRES</b>	<b>-3,500 ACRES</b>	<b>-3,500 ACRES</b>
• <b>HIGH DENSITY CALVING</b>	<b>NONE</b>	<b>+36,000 ACRES</b>	<b>+36,000 ACRES</b>	<b>NONE</b>	<b>NONE</b>
<b>STATE WINTER RANGE &amp; MIGRATION CORRIDOR</b>					
• <b>HIGH USE WINTER RANGE &amp; MIGRATION</b>	<b>NONE</b>	<b>-35,799 ACRES</b>	<b>-35,773 ACRES</b>	<b>NONE</b>	<b>NONE</b>

<ul style="list-style-type: none"> <li>• HIGH USE DENSITY CALVING</li> </ul>	NONE	-36,000 ACRES	-36,000 ACRES	NONE	NONE
<b>KING COVE CORPORATION WINTER RANGE &amp; MIGRATION CORRIDOR</b>					
<ul style="list-style-type: none"> <li>• HIGH USE WINTER RANGE &amp; MIGRATION</li> </ul>	+3,500 ACRES	-15,392 ACRES	-15,392 ACRES	+3,500 ACRES	+3,500 ACRES
<ul style="list-style-type: none"> <li>• HIGH DENSITY CALVING</li> </ul>	NONE	NONE	NONE	NONE	NONE

**CONCLUSIONS**

THE KCG CONCLUDES ALTERNATIVE 2 OR ALTERNATIVE 3 WILL --

- HAVE A MAJOR POSITIVE EFFECT ON CARIBOU BY THE ADDITION OF 36,000 ACRES OF HIGH DENSITY CALVING HABITAT THAT WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM.
- HAVE A LOW PROBABILITY TO INTERRUPT CARIBOU MIGRATION.
- THE KCG CONCLUDES ALTERNATIVE 2 WILL HAVE THE LEAST POTENTIAL EFFECT ON CARIBOU MIGRATION BECAUSE IT IS FURTHER FROM THE SHORE OF THE IZEMBEK LAGOON COMPLEX AND TO THE MAXIMUM EXTENT PRACTICABLE AVOIDS THE HIGHER ELEVATIONS ASSOCIATED WITH THE DIVIDE BETWEEN THE IZEMBEK LAGOON COMPLEX AND KINZAROF LAGOON.

**RECOMMENDATIONS**

KCG RECOMMENDS --

- 37. THE FEIS SHOULD BE REVISED TO REFLECT ANY IMPLICATION THAT CARIBOU WILL NOT USE HABITATS SOUTH OF EITHER THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR BECAUSE THE DEIS CONCLUDES THE PROBABILITY OF A ROAD DEFLECTING CARIBOU MOVEMENTS IS LOW.
- 38. LOCAL SUBSISTENCE USERS SHOULD BE CONSULTED ON THE DESIGN OF THE BARRIER SYSTEM THAT WILL BE PLACED ON BOTH SIDES OF THE ROAD TO INCORPORATE LOCAL KNOWLEDGE ON CARIBOU MOVEMENTS IN THE IZEMBEK AND ALASKA PENINSULA NATIONAL WILDLIFE REFUGES.
- 39. THE BARRIER SYSTEM BE PLACED ON THE BOUNDARY BETWEEN THE STATE AND FEDERAL OWNERSHIP TO PROVIDE MAXIMUM SPACE FOR CARIBOU TO AVOID THE ROAD WHEN TRAVELLING INSIDE THE BARRIER SYSTEM.

**BROWN BEAR**

Subtitle E will add about 57,030 acres of important bear habitats (43,930 acres of Spring, Summer, Fall high density use, 12,100 acres of medium density use, and 1,000 acres of high density denning habitat) that will be added to the National Wildlife Refuge System. Approximately 49,700 acres of key Brown Bear habitat will be located on land that becomes, or is retained as, part of the National Wilderness Preservation System. The DEIS indicates there are no Brown Bear on Sitkinak Island. The DEIS effect conclusions for Brown Bear considers assumes an increase in hunter success. The DEIS does not provide information to validate this conclusion. The FEIS should delete the conclusion or provide the context for the assumed increase in number of brown bears harvested or whether the projected increased harvest is a re-distribution of hunters vs. an increase in the total number of hunters pursuing Brown Bear in the National Wildlife Refuge System, King Cove Corporation private land, and State land.

Table 22. Summary Comparison of Acres of Brown Bear High, Medium, and Low Density Spring, Summer, and Fall Use and High Density Denning Added or Removed from the National Wildlife Refuge System and the National Wilderness Preservation System under Subtitle E.

PARCEL	NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT (ALTERNATIVE 1)	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERNL ROAD CORRIDOR (ALTERNATIVE 2)	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR (ALTERNATIVE 3)	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT (ALTERNATIVE 4)	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY (ALTERNATIVE 5)
STATE <sup>a</sup> SPRING, SUMMER, FALL					
• HIGH	NONE	39,700 ACRES	39,700 ACRES	NONE	NONE
• MEDIUM	NONE	1,600 ACRES	1,600 ACRES	NONE	NONE
• LOW	NONE	NONE	NONE	NONE	NONE
DENNING					
• HIGH	NONE	600 ACRES	600 ACRES	NONE	NONE
MORTENSENS LAGOON SPRING, SUMMER, FALL					
• HIGH	NONE	NONE	NONE	NONE	NONE
• MEDIUM	NONE	8,092 ACRES	8,092 ACRES	NONE	NONE
• LOW	NONE	NONE	NONE	NONE	NONE
DENNING					
• HIGH	NONE	NONE	NONE	NONE	NONE

<b>KINZAROF LAGOON<sup>a</sup></b> SPRING, SUMMER, FALL <ul style="list-style-type: none"> <li>• HIGH</li> <li>• MEDIUM</li> <li>• LOW</li> </ul> DENNING <ul style="list-style-type: none"> <li>• HIGH</li> </ul>	NONE NONE NONE NONE	NONE 2,400 ACRES NONE NONE	NONE 2,400 ACRES NONE NONE	NONE NONE NONE NONE	NONE NONE NONE NONE
<b>KING COVE CORPORATION RELINQUISHMENT<sup>b</sup></b> SPRING, SUMMER, FALL <ul style="list-style-type: none"> <li>• HIGH</li> <li>• MEDIUM</li> <li>• LOW</li> </ul> DENNING <ul style="list-style-type: none"> <li>• HIGH</li> </ul>	5,000 ACRES NONE NONE 400 ACRES	5,000 ACRES NONE NONE 400 ACRES	5,000 ACRES NONE NONE 400 ACRES	5,000 ACRES NONE NONE 400 ACRES	5,000 ACRES NONE NONE 400 ACRES
<b>SITKINAK ISLAND</b>	NOT DISCUSSED	NOT DISCUSSED	NOT DISCUSSED	NOT DISCUSSED	NOT DISCUSSED
<b>KINZAROF LAGOON<sup>c</sup></b> SPRING, SUMMER, FALL <ul style="list-style-type: none"> <li>• HIGH</li> <li>• MEDIUM</li> <li>• LOW</li> </ul> DENNING <ul style="list-style-type: none"> <li>• HIGH</li> </ul>	NONE NONE NONE NONE	NONE NONE SHORELINE AND SHALLOW WATERS NONE	NONE NONE SHORELINE AND SHALLOW WATERS NONE	NONE NONE NONE NONE	NONE NONE NONE NONE
<b>CORRIDOR<sup>d</sup></b> SPRING, SUMMER, FALL <ul style="list-style-type: none"> <li>• HIGH</li> <li>• MEDIUM</li> <li>• LOW</li> </ul> DENNING <ul style="list-style-type: none"> <li>• HIGH</li> </ul>	NONE NONE NONE NONE	70 ACRES 130 ACRES NONE NONE	70 ACRES 160 ACRES NONE NONE	NONE NONE NONE NONE	NONE NONE NONE NONE

<sup>a</sup> ADDED TO THE NATIONAL WILDERNESS PRESERVATION UNDER ALTERNATIVES 2 AND 3

- <sup>b</sup> RETAINED IN THE IZEMBEK WILDERNESS UNDER ALTERNATIVES 2, AND 3; REMOVED FROM THE IZEMBEK WILDERNESS UNDER ALTERNATIVES 1,4, AND 5
- <sup>c</sup> ADDED TO THE IZEMBEK STATE GAME REFUGE UNDER ALTERNATIVES 2 AND 3
- <sup>d</sup> REMOVED FROM THE IZEMBEK WILDERNESS UNDER ALTERNATIVES 2 AND 3\

#### CONCLUSIONS

##### THE KCG CONCLUDES --

- ALTERNATIVES 2 AND 3 WILL HAVE THE SAME GENERAL EFFECT ON BROWN BEARS SINCE BROWN BEAR USE IS WIDELY DISTRIBUTED THROUGHOUT THE GENERAL AREA OF THE LAND EXCHANGE.
- ADDITION OF 1,000 ACRES OF HIGH DENSITY BROWN BEAR DENNING HABITAT THAT WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM WILL BE BENEFICIAL.
- TRANSFER OF 201 FEDERAL ACRES OF BROWN BEAR HABITAT UNDER ALTERNATIVE 2 OR 227 ACRES OF FEDERAL LAND UNDER ALTERNATIVE 3 WILL HAVE NEGLIGIBLE OR MINOR DIRECT AND INDIRECT EFFECT ON BROWN BEAR DURING CONSTRUCTION AND DURING OPERATION AND MAINTENANCE\_A GENERAL REDUCTION OF BROWN BEAR IN THE GENERAL VICINITY OF A ROAD MAY BE SLIGHTLY GREATER FOR A ROAD IN THE CENTRAL ROAD CORRIDOR BASED ON 3 YEARS OF OBSERVATIONS SHOWN IN FIGURE 3.2-18.
- ALTERNATIVES 1, 4, AND 5 WILL RESULT IN A MINOR NEGATIVE TO MODERATE EFFECT ON BROWN BEAR MANAGEMENT WITH THE REMOVAL OF 5,000 ACRES OF HIGH DENSITY SPRING, SUMMER, AND FALL HABITATS AND 400 ACRES OF HIGH USE DENNING FROM THE IZEMBEK WILDERNESS.

Table 23. Summary Net Gain or Loss of Acres of Brown Bear High, Medium, and Low Density Spring, Summer, and Fall Use and High Density Denning Added or Removed from the National Wildlife Refuge System and the National Wilderness Preservation System under Subtitle E.

OWNERSHIP	NO LAND EXCHANGE WITH A CONCEPTUAL PASSENGER CARRYING LANDING CRAFT  (ALTERNATIVE 1)	LAND EXCHANGE WITH ROAD LOCATED IN THE SOUTHERNL ROAD CORRIDOR  (ALTERNATIVE 2)	LAND EXCHANGE WITH ROAD LOCATED IN THE CENTRAL ROAD CORRIDOR  (ALTERNATIVE 3)	NO LAND EXCHANGE WITH A CONCEPTUAL HOVERCRAFT  (ALTERNATIVE 4)	NO LAND EXCHANGE WITH A CONCEPTUAL FERRY  (ALTERNATIVE 5)
REFUGE SPRING, SUMMER, FALL • HIGH	NONE	+43, 930 ACRES	+43, 930 ACRES	NONE	NONE
• MEDIUM	NONE	+12,020 ACRES	+11,960 ACRES	NONE	NONE
• LOW	NONE	NONE	NONE	NONE	NONE
DENNING					
• HIGH	NONE	+1,000 ACRES	+1,000 ACRES	NONE	NONE
STATE					
SPRING, SUMMER, FALL					
• HIGH	NONE	-39,700 ACRES	-39,700 ACRES	NONE	NONE
• MEDIUM	NONE	-1,600 ACRES	-1,600 ACRES	NONE	NONE
• LOW	NONE	NONE	NONE	NONE	NONE
DENNING					
• HIGH	NONE	-600 ACRES	-600 ACRES	NONE	NONE
KING COVE					
CORPORATION					
SPRING, SUMMER, FALL					
• HIGH	+5,000 ACRES	-5,000 ACRES	-5,000 ACRES	+5,000 ACRES	+5,000 ACRES
• MEDIUM	+10,490 ACRES	-10,490 ACRES	-10,490 ACRES	+10,490 ACRES	+10,490 ACRES
• LOW	NONE	NONE	NONE	NONE	NONE
DENNING					
• HIGH	+400 ACRES	+400 ACRES	+400 ACRES	+400 ACRES	+400 ACRES

### THREATENED AND ENDANGERED SPECIES

The DEIS notes that Steller's Eider (listed species), Kittlitz's Murrelet (candidate species), Northern Sea Otter (listed), and Western District Steller Sea Lion (listed) are present on some of the land associated with the parcels identified in Subtitle E. Although Federal agencies are required to give special attention to a proposed action that may affect a species listed under the Endangered Species Act and the Marine Mammal Protection Act, the Service determined consultation under Section 7 of the Endangered Species Act for Alternative 2 or Alternative 3 will not be addressed in the DEIS.

The Yellow-billed Loon (warranted, but precluded) is occasionally present with so few recorded observations over the period 1987-2010 that it is considered a "rare" visitor to the Izembek NWR. The DEIS reports the Yellow-billed Loon does not nest on the Izembek NWR and there is no designated Critical Habitat. Accordingly, the KCG has no comment on the effect of Subtitle E on rare visits to the general area by the Yellow-billed Loon.

***Steller's Eider*** -- The DEIS indicates Steller's Eider do not nest in the Izembek NWR and are common during the Spring, Fall, and Winter. The entirety of the Izembek Lagoon Complex--waters, eelgrass beds and intertidal shorelines are in State ownership and managed as part of the Izembek State Game Refuge. Within the exterior boundaries of the designated Critical Habitat for the Izembek Lagoon Complex are two areas identified as high density molting habitat. There are no designated Critical Habitats or high density molting habitat for Steller's eider on Kinzarof Lagoon. Both the Izembek Lagoon Complex and the Kinzarof Lagoon are considered to provide high density use wintering habitat for Steller's Eider.

Subtitle E requires the Kinzarof Lagoon with its State owned 4,282 acres of water and submerged land, 2,300 acres of eelgrass beds, and 17 miles of intertidal shoreline be added to the Izembek State Game Refuge. In addition the remaining islands in the mouth of Kinzarof Lagoon and the spits and bars and that are part of the Kinzarof Lagoon Parcel will be donated to the Federal Government for addition to the National Wildlife Refuge, as will 5 miles of uplands adjoining Kinzarof Lagoon and 5 miles adjoining Cold Bay; making all the uplands adjoining the shoreline managed as Wilderness.

Neither the Southern Road Corridor nor the Central Road Corridor directly involve habitat for Steller's Eider.

The DEIS concluded the effect on Steller's Eider likely will not change use patterns.

**CONCLUSIONS****THE KCG CONCLUDES --**

- BOTH ALTERNATIVE 2 AND 3 WILL RESULT IN A MAJOR BENEFICIAL EFFECT TO STELLER'S EIDER BY THE ADDITION OF THE 4,282 ACRES OF WATER AND SUBMERGED LAND, 2,300 ACRES OF EELGRASS BEDS, 17 MILES OF INTERTIDAL SHORELINE THAT WILL BE ADDED TO THE IZEMBEK STATE GAME REFUGE AND MANAGED IN THE SAME MANNER AS STATE OWNED WATERS, SUBMERGED LANDS, AND INTERTIDAL SHORELINE THAT MAKE UP THE IZEMBEK LAGOON COMPLEX. IN ADDITION, PARTS OF THE KINZAROF LAGOON PARCEL THAT INCLUDE 5 MILES OF UPLAND SHORELINE ON KINZAROF LAGOON, 5 MILES ON COLD BAY AND KING COVE CORPORATION OWNERSHIP OF THE REMAINING ISLANDS IN THE MOUTH OF KINZAROF LAGOON AND THE SPITS AND BARS TO THE SOUTHWEST OF KINZAROF LAGOON WILL BE TRANSFERRED TO THE FEDERAL OWNERSHIP FOR INCLUSION IN THE NATIONAL WILDLIFE REFUGE SYSTEM.
- SUBTITLE E WILL RESULT IN THE ENTIRE UPLAND SHORELINE OF KINZAROF LAGOON BEING MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM, WHICH WILL PROVIDE GREATER PROTECTION TO STELLER'S EIDER THAN DOES THE IZEMBEK LAGOON COMPLEX WHICH HAS PUBLIC MOTORIZED ACCESS TO SEVERAL POINTS AND IS NOT COMPLETELY SURROUNDED BY WILDERNESS.
- ALTERNATIVE 3 HAS GREATER POTENTIAL TO IMPACT DESIGNATED CRITICAL HABITATS FOR THE STELLER'S EIDER ON THE IZEMBEK LAGOON COMPLEX THAN OTHER ALTERNATIVES INCLUDING NO ACTION.

**RECOMMENDATION****THE KCG RECOMMENDS --**

- 40. ALTERNATIVE 2 SHOULD BE SELECTED BY THE SERVICE AND THE CORPS AS THE PREFERRED ALTERNATIVE AND THE ENVIRONMENTALLY PREFERRED ALTERNATIVE TO PROVIDE SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT BECAUSE IT AFFORDS MORE PROTECTION TO DESIGNATED CRITICAL HABITAT FOR STELLER'S EIDER IN THE IZEMBEK LAGOON COMPLEX.
- 41. THE SERVICE SHOULD REVIEW THE KNOWN MITIGATION MEASURES THAT WILL BE APPLIED TO CONSTRUCTION AND OPERATION, AND TRAVEL ON A ROAD LOCATED IN BOTH THE SOUTHERN ROAD CORRIDOR AND THE CENTRAL ROAD CORRIDOR TO MORE CLEARLY IDENTIFY WHETHER ADDITIONAL SITE SPECIFIC MITIGATIONS, A BIOLOGICAL ASSESSMENT, OR BIOLOGICAL OPINION FOR STELLER'S EIDER IS REQUIRED AND THEN INCLUDED IN THE FEIS AND THE RECORD OF DECISION AS A BASIS FOR THE SECRETARY OF INTERIOR'S DETERMINATION OF THE PUBLIC INTEREST IN PROVIDING A SAFE RELIABLE, AND AFFORDABLE WAY TO TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT AS ENVISIONED BY SUBTITLE E.

***Kittitz's Murrelet*** -- There is no designated Critical Habitat for the Kittitz's Murrelet. A single nesting site has been reported on the higher elevations of Frosty Peak. No other nesting sites have been documented in the Izembek NWR. The southern limits of the King Cove Corporation Relinquishment Parcel are on the lower flanks of Mt. Dutton and may have potential nesting habitat for the Kittlitz's Murrelet.

### CONCLUSIONS

#### THE KCG CONCLUDES --

- THAT CONSTRUCTION, OPERATION, MAINTENANCE, AND TRAVEL ON A ROAD IN THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR WILL NOT HAVE A MEASURABLE EFFECT ON KITTLITZ'S MURRELET THAT MAY FLY ACROSS EITHER ROAD SINCE THERE IS NO DOCUMENTATION OF ANY NEGATIVE EFFECT TO AN AIRBORNE KITTLITZ'S MURRELET CROSSING ANY OF THE EXISTING ROADS IN THE IZEMBEK NWR OR THE ALASKA PENINSULA NWR.
- THERE IS POTENTIAL KITTLITZ'S MURRELETE NESTING HABITAT ON THE HIGHER ELEVATIONS OF THE KING COVE CORPORATION RELINQUISHED SELECTION PARCEL. UNDER ALTERNATIVES 2 AND 3, THIS POTENTIAL NESTING HABITAT WILL REMAIN A PART OF THE IZEMBEK WILDERNESS. UNDER ALTERNATIVES 1, 4, AND 5 THIS POTENTIAL HABITAT WILL BE TRANSFERRED TO THE PRIVATE OWNERSHIP OF THE KING COVE CORPORATION. THE EFFECT OF RETAINING OR ELIMINATING THIS PARCEL IN WILDERNESS IS UNCERTAIN.

### RECOMMENDATIONS

#### THE KCG RECOMMENDS --

#### 42. THE SERVICE PROVIDE DOCUME

- NTATION FOR THE FEIS THAT VALIDATES THE DEIS ASSUMPTION THERE COULD BE A NEGATIVE EFFECT TO KITTLITZ'S MURRELET FLYOVERS AND DISCUSS THIS EFFECT IN SUFFICIENT DETAIL SO THE RECORD OF DECISION CLEARLY IDENTIFIES WHETHER ADDITIONAL CONSULTATION UNDER SECTION 7 OR THAT A BIOLOGICAL ASSESSMENT OR BIOLOGICAL OPINION IS REQUIRED FOR THE KITTLITZ'S MURRELETE.

**Northern Sea Otter (Southwest Alaska District Population** -- Designated Critical Habitat for the Northern Sea Otter includes the Izembek Lagoon Complex, Kinzarof Lagoon, the northern and southern parts of Cold Bay, and Mortensens Lagoon. Subtitle E will result in the Critical Habitat for the Northern Sea Otter in Kinzarof Lagoon (with its 4,282 acres of State owned water and submerged land including 2,300 acres of eelgrass bed and 17 miles of intertidal shoreline) being added to the Izembek State Game Refuge and managed like the State owned waters, eelgrass, and intertidal shoreline of the Izembek Lagoon Complex. Other designated Critical Habitat for the Northern Sea Otter that will be donated to the Federal Government for addition to the National Wildlife Refuge System include the islands in the mouth of Kinzarof Lagoon, bars and spits and uplands adjoining 5 miles of Kinzarof Lagoon, 7 miles adjoining Cold Bay, and 5 miles adjoining Mortensens Lagoon. Neither the Southern Road Corridor nor the Central Road Corridor are identified as having habitat for the Northern Sea Otter although Northern Sea Otter have been reported to cross from the Izembek Lagoon Complex to Cold Bay when there are dense sea ice concentrations in the southern Bering Sea. The Sitinak Island Parcel adjoins designated critical habitat of the Northern Sea Otter with 2.5 miles of shoreline on the Gulf of Alaska, 2.5 miles of shoreline on Sitkinak Lagoon and 5 miles of shoreline on the intertidal waterway. These shorelines will be transferred from Federal ownership of the former USCG station on Sitkinak Island to the State under Subtitle E.

### CONCLUSIONS

#### THE KCG CONCLUDES --

- A ROAD LOCATED IN EITHER THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR WILL HAVE THE SAME EFFECT TO THE POPULATION OF NORTHERN SEA OTTER, e. g., NEGLIGIBLE DURING CONSTRUCTION MINOR DURING OPERATION AND MAINTENANCE.
- SUBTITLE E WILL HAVE A MAJOR POSITIVE EFFECT ON THE DESIGNATED CRITICAL HABITATS FOR THE NORTHERN SEA OTTER BY ADDING THE 4,282 ACRES OF STATE OWNED WATER AND SUBMERGED LAND THAT INCLUDES 2, 300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE TO IZEMBEK STATE GAME REFUGE. IN ADDITION THE UPLANDS ADJOINING DESIGNATED CRITICAL HABITAT THAT WILL BE TRANSFERRED TO THE FEDERAL OWNERSHIP FOR INCLUSION IN THE NATIONAL WILDLIFE REFUGE SYSTEM, LANDS ADJOINING THE KINZAROF LAGOON AND PART OF THE SHORE LINE ON COLD BAY WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM.
- SUBTITLE E WILL HAVE A NEGLIGIBLE EFFECT ON CRITICAL HABITAT ADJOINING THE FORMER USCG STATION ON SITKINAK ISLAND SINCE THE SHORELINE IS STILL IN PUBLIC MANAGEMENT AS IS THE REST OF THE UPLAND AND INTERTIDAL SHORELINES AND MARINE WATERS; ALL IN STATE OWNERSHIP.

### RECOMMENDATIONS

#### THE KCG RECOMMENDS --

- 43. THE SERVICE DETERMINE WHETHER ANY OF THE ALTERNATIVES WILL NEGATIVELY EFFECT DESIGNATED CRITICAL HABITAT TO THE EXTENT THE RECORD OF DECISION CLEARLY IDENTIFIES WHETHER ADDITIONAL CONSULTATION UNDER SECTION 7 OR THAT A BIOLOGICAL ASSESSMENT OR BIOLOGICAL OPINION IS REQUIRED FOR THE NORTHERN SEA OTTER.

***Steller Sea Lion - Western District Population*** -- Designated Critical Habitat for the Steller Sea Lion includes the State owned waters, submerged land and intertidal shoreline that Izembek Lagoon Complex and the barrier islands on the north side of the Izembek Lagoon Complex. State owned marine waters adjoining Sitkinak Island are also designated as Critical Habitat for the Northern Sea Lion. No terrestrial rookeries or haulouts are located in the Izembek NWR on the Sitkinak Island Parcel. The DEIS concludes a road located in either the Southern Road Corridor or the Central Road Corridor will have no direct, indirect, or cumulative effect on the population of Steller Sea Lion. The KCG concurs.

## MARINE MAMMALS

The DEIS considers only Harbor Seals to be the only marine mammal to be potentially effected by Subtitle E . Harbor Seals are known to use the "flats" of Izembek Lagoon, Cold Bay and at Sitkinak Island. Alternative 2 and Alternative 3 will result in the known Harbor Seal haul outs located on the Kinzarof Lagoon Parcel being transferred to Federal ownership as part of the Izembek Wilderness. DEIS Figure 3.2-24 indicate none of the haul outs on Sitkinak Island are located on the former USCG Station. The DEIS concludes the effect of Alternative 2 or Alternative 3 oon harbor seals will be negligible to minor.

The KCG notes the land between the Southern Road Corridor has no existing vehicle access and the entire shoreline is managed as part of the Izembek Wilderness. The Central Road Corridor near the shore of Izembek Lagoon Complex is not part of the Izembek Wilderness and already has several motorized public road/trails providing direct access for the public and for subsistence users to the shore.

### CONCLUSIONS

#### THE KCG CONCLUDES --

- **ALTERNATIVE 2 AND ALTERNATIVE 3 WILL HAVE ESSENTIALLY THE SAME EFFECT ON HARBOR SEAL HABITAT AND POPULATIONS. HOWEVER. A ROAD IN THE SOUTHERN ROAD CORRIDOR HAS A BUFFER OF WILDERNESS BETWEEN THE BOUNDARY OF THE CORRIDOR AND THE SHORES OF KINZAROF LAGOON; A ROAD IN THE CENTRAL ROAD CORRIDOR DOES NOT.**
- **ALTERNATIVE 2 AND ALTERNATIVE 3 WILL HAVE A DIRECT POSITIVE EFFECT ON HARBOR SEALS BECAUSE KNOWN HAUL OUTS WILL BE CONVEYED BY THE KING COVE CORPORATION TO FEDERAL OWNERSHIP FOR MANAGEMENT AS PART OF THE NATIONAL WILDLIFE REFUGE SYSTEM. HAUL OUTS ON ISLANDS IN THE MOUTH OF KINZAROF LAGOON DONATED BY THE KING COVE CORPORATION TO THE FEDERAL GOVERNMENT WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS SYSTEM.**
- **THE ADDITION OF THE IZEMBEK LAGOON WITH ITS 4,282 ACRES OF STATE WATERS AND SUBMERGED LAND WHICH INCLUDES 2,300 ACRES OF EELGRASS BEDS AND 17 MILES OF INTERTIDAL SHORELINE TO THE IZEMBEK STATE GAME REFUGE WILL AFFORD PROTECTION OF HARBOR SEAL HABITAT IN THE SAME MANNER AS THE IZEMBEK LAGOON COMPLEX.**
- **THE TRANSFER OF THE FORMER USCG ON SITKINAK ISLAND TO THE STATE WILL HAVE NO MEASURABLE EFFECT TO HARBOR SEALS HAUL OUTS SINCE NO HAUL OUTS ARE INVOLVED IN SITKINAK ISLAND PARCEL.**

### RECOMMENDATIONS

#### THE KCG RECOMMENDS --

- **44. ALTERNATIVES 2 OR 3 SHOULD BE SELECTED BY THE SERVICE AND THE CORPS AS THE PREFERRED ALTERNATIVE AND THE ENVIRONMENTALLY PREFERRED ALTERNATIVE FOR A SAFE, RELIABLE, AND AFFORDABLE MEANS TO TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT AS ENVISIONED BY SUBTITLE E BECAUSE THE BOLLARD/CHAIN BARRIER SYSTEM TOGETHER WITH A BUFFER OF WILDERNESS BETWEEN THE BOUNDARY OF THE SOUTHERN ROAD CORRIDOR AND THE SHORES OF KINZAROF LAGOON WILL GIVE MAXIMUM PROTECTION TO HARBOR SEAL HABITATS of the Izembek Lagoon Complex. the KCG concludes this effect will be direct and positive**

## FISH AND ESSENTIAL FISH HABITAT

The DEIS concludes there will be a negligible direct effect on essential fish habitat from construction of a road in either the Southern Road Corridor or the Central Road Corridor. Important fish streams are noted as being located in all the Parcels indentified in Subtitle E. Fish streams located in the Izembek Wilderness are considered "unique" fish habitat because these are located in the Izembek Wilderness. The DEIS suggests overfishing is likely in the vicinity of stream crossings with no explanation..

### CONCLUSIONS

#### THE KCG CONCLUDES --

- CONSTRUCTION OF A ROAD IN EITHER THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR WILL NOT HAVE A DIRECT OR INDIRECT MEASURABLE EFFECT ON ESSENTIAL FISH HABITAT.
- ADDITION OF ANADROMOUS FISH STREAMS IN THE MORTENSENS LAGOON PARCEL, KINZAROF LAGOON PARCEL, AND THE STATE PARCEL WILL BE A POSITIVE IMPACT TO FISH HABITAT AND FISH POPULATIONS SINCE THESE HABITATS WILL BE TRANSFERRED TO FEDERAL OWNERSHIP AS PART OF THE NATIONAL WILDLIFE REFUGE SYSTEM.
- ADDITION OF ANADROMOUS FISH STREAMS IN THE KINZAROF LAGOON PARCEL AND THE STATE PARCEL TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM WILL HAVE A MAJOR POSITIVE EFFECT BECAUSE THESE STREAMS WILL BECOME "UNIQUE" ESSENTIAL FISH HABITAT.
- ALTERNATIVES 1, 4, AND 5 WILL RESULT IN A NEGATIVE EFFECT ON THE "UNIQUE" FISH HABITAT ON THE KING COVE CORPORATION RELINQUISHMENT PARCEL THAT WILL BE REMOVED FROM THE IZEMBEK WILDENESS.
- FISH HABITAT ASSOCIATED WITH THE SITKINAK ISLAND PARCELS IS NOT "UNIQUE" AND WILL HAVE NO MEASURABLE EFFECT ON FISH HABITAT AND POPULATIONS.

### RECOMMENDATIONS

#### THE KCG RECOMMENDS ---

- 45. THE FEIS justify THE RISK/PROBABILITY OF "INCREASED HARVEST PRESSURE" FOR SOME OF THE STREAMS CROSSED BY THE SOUTHERN ROAD CORRIDOR AND THE CENTRAL ROAD CORRIDOR GIVEN THE FACT THAT POTENTIAL FISHING PRESSURE ON THESE STREAMS BY SUBSISTENCE USERS OR SPORT FISHING COMING FROM PEOPLE STARTING IN THE CITY OF KING COVE WILL REQUIRE DRIVING AT LEAST 25 MILES WHILE PASSING EXCELLENT FISHING OPPORTUNITIES ON THE SHORES AND TRIBUTARIES TO KING COVE LAGOON AND HAVE DIRECT ACCESS TO 5 ANADROMOUS STREAMS AT 17 CROSSINGS. LIKewise, SUBSISTENCE USERS AND SPORT FISHING USE ORIGINATING FROM THE CITY OF COLD BAY WILL HAVE TO TRAVEL AT LEAST 20 MILES WHILE HAVING CLOSER AND BETTER FISHING OPPORTUNITIES. COMMON SENCE WOULD SUGGEST THAT THE PROBABILITY OF OVERFISHING IS MINOR.

## LAND USE

Subtitle E authorizes a changed land use for more than 69,600 acres (see Table 1). Alternative 2 will result in the loss of 131 acres from the Izembek Wilderness while adding 49,790 acres to the National Wilderness Preservation System. Alternative 3 will result in a loss of 152 acres from the Izembek Wilderness while adding or retaining 49,769 acres to the National Wilderness Preservation System (see Table 15). The DEIS generally discusses existing land use and identified future uses and concluded the effect of Alternative 2 or Alternative 3 will be "major" with no explanation while the impact to land use under Alternatives 1, 4, and 5 will be "minor". The FEIS needs to re-examine these conclusions since existing general land uses would continue for the next 5 to 10 years.

### THE KCG CONCLUDES --

- **ALTERNATIVES 2 AND 3 WILL HAVE A MAJOR POSITIVE EFFECT ON LAND USE IN THE IZEMBEK NWR AND ALASKA PENINSULA NWR BECAUSE A NET OF 56,193 ACRES WILL BE TRANSFERRED TO FEDERAL OWNERSHIP TO BE MANAGED AS PART OF THE NATIONAL WILDLIFE REFUGE SYSTEM.**
- **ALTERNATIVE 2 WILL HAVE A MAJOR POSITIVE EFFECT ON LAND USE BECAUSE A NET OF 49,790 ACRES WILL BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM.**
- **ALTERNATIVE 3 WILL HAVE A MAJOR POSITIVE EFFECT ON LAND USE BECAUSE A NET OF 49,769 ACRES WILL BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM.**
- **ALTERNATIVES 2 AND 3 WILL HAVE A SPECULATIVE, BUT MAJOR UNKNOWN NEGATIVE EFFECT ON THE FUTURE LAND USE OF 5,430 ACRES OF REPLACEMENT LAND IN THE ALASKA PENINSULA NATIONAL WILDLIFE REFUGE.**
- **ALTERNATIVES 2 AND 3 WILL HAVE A MAJOR NEGATIVE EFFECT ON THE KING COVE CORPORATION POTENTIAL TO USE 16,126 ACRES OF LAND DONATED TO THE FEDERAL GOVERNMENT FOREVER, NOT JUST THE NEXT 5 TO 10 YEARS, IN RETURN FOR A SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT. THE KCG NOTES THE SHAREHOLDERS OF THE KING COVE CORPORATION HAVE DETERMINED THE CONVEYANCE OF ITS OWNERSHIP IS IN THEIR INTEREST SINCE IT WILL RESULT IN A ROAD BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT.**
- **ALTERNATIVES 2 AND 3 WILL HAVE A MAJOR POSITIVE EFFECT ON LAND USE INVOLVING UP TO 15,560 ACRES OF WETLANDS INCLUDING 4,282 ACRES OF STATE OWNERSHIP WITH ITS 2,300 ACRES OF EELGRASS BEDS AND 17 MILES OF INTERTIDAL SHORELINE, TO BE MANAGED AS A PART OF THE IZEMBEK STATE GAME REFUGE IN THE SAME MANNER AS ARE STATE OWNERSHIPS COMPRISING THE IZEMBEK LAGOON COMPLEX.**
- **ALTERNATIVES 1, 4, AND 5 WILL HAVE A MAJOR NEGATIVE EFFECT ON LAND USE ON 5,430 ACRES WITH ITS UNIQUE RESOURCES THAT WILL BE REMOVED FROM THE NATIONAL WILDERNESS SYSTEM.**
- **THE LOSS OF UP TO 152 ACRES OF UNIQUE FEDERAL OWNERSHIP IN THE NATIONAL WILDERNESS PRESERVATION SYSTEM IS MORE THAN OFFSET BY THE ADDITION OR RETENTION OF 49,921 ACRES OF NON-FEDERAL LANDS ADDED TO THE NATIONAL WILDLIFE SYSTEM, NATIONAL WILDERNESS PRESERVATION SYSTEM AND THE WETLANDS AND OTHER RESOURCES LOCATED ON THESE NON-FEDERAL OWNERSHIPS.**

**RECOMMENDATION**

**THE KCG RECOMMENDS --**

- **46. THE FEIS RECOGNIZE THAT THE LAND USE ON KING COVE CORPORATION DONATED OWNERSHIPS INCLUDING THE LANDS ADDED TO OR SUBTRACTED FROM THE NATIONAL WILDERNESS PRESERVATION SYSTEM ARE FOREVER, NOT JUST THE NEXT 5 TO 10 YEARS. IN RETURN ALL RESIDENTS, WORKERS, AND VISITORS TO THE CITY OF KING COVE WILL HAVE SAFE, RELIABLE, AND AFFORDABLE ACCESS TO AND FROM THE COLD BAY AIRPORT.**
- **47. THE FEIS CLEARLY RECOGNIZE THE DEPARTMENT OF THE INTERIOR, STATE, AND KING COVE CORPORATION SUPPORTED SUBTITLE E WITH ITS IMPLIED CHANGES IN LAND USE INCLUDING THE LOSS OF UP TO 152 ACRES OF THE IZEMBEK WILDERNESS. THIS IS A REPEATED RECOMMENDATION OF THE KCG; MOST RECENTLY IN THE DECEMBER 23, 2011 COMMENTS TO THE SERVICE.**

**PUBLIC USE**

The DEIS Table 3.3.5-2 shows the number of visitors to Cold Bay were primarily engaged in 3 major categories: waterfowl hunting, wildlife observation, and unspecified “other” recreation. During 2006 and 2007 the total number of visitors was just over 4,000. In 2008 and 2009, the total number of visitors rose to just over 5,000. In 2010 the number of visitors increased by 2,500 (to 7,600) attributed to an increase of scheduled stops by the Alaska Ferry to Cold Bay. The DEIS notes recreation use is concentrated on the road system extending from the City of Cold Bay. There are no records on where existing use occurs or any relationship to public use on road accessible areas, including the Mortensens Lagoon Parcel. The Service has no data on how many of the reported visitors enter the Izembek Wilderness. Likewise, the State does not have public use data for the State Parcel. The Sitkinak Island Parcel is closed to public use by the USCG. and the former USCG. The King Cove Corporation does not track public use or Shareholder use on its land, but does charge a fee for certain uses.

The DEIS notes the effect on public use as a result of implementing Subtitle E will have a major and permanent effect on land use. The DEIS concludes the construction of a road in either the Southern Road Corridor or a Central Road Corridor have a minor effect on public use. Land ownership changes are permanent and in turn have a direct, indirect, and cumulative effect on both existing and future public use.

Table 24. Effects to Public Use under Subtitle E.

PARCEL (ACREAGE)	COMMENT
STATE (41,887 ACRES)	<p><b><u>OVERALL NO NEGATIVE EFFECT ON PUBLIC USE:</u></b> LANDS ARE REMOTE; THERE ARE NO ROADS AND NO PUBLIC USE FACILITIES OR OTHER FACILITIES ACCOMMODATING PUBLIC USE. EXISTING PUBLIC USE AND MODES OF TRANSPORTATION ARE IN ACCORD WITH STATE LAND USE POLICIES. UNDER SUBTITLE E THESE LANDS WILL BE MANAGED AS A UNIT OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM WITH NO MOTORIZED ACCESS EXCEPT FOR QUALIFIED LOCAL RESIDENTS UNDER ANILCA.</p>
MORTENSENS LAGOON (8,092 ACRES)	<p><b><u>OVERALL POSITIVE EFFECT ON PUBLIC USE:</u></b> THE MORTENSENS LAGOON PARCEL IS PRIVATE LAND DIRECTLY ACCESSIBLE FROM A GRAVEL ROAD RESERVED FOR PUBLIC ACCESS BETWEEN THE CITY OF COLD BAY AND THE WATERS OF MORTENSENS LAGOON. EXISTING PUBLIC USE OF KING COVE CORPORATION LAND IS AT THE EXCLUSIVE DISCRETION OF THE KING COVE CORPORATION AS DIRECTED BY SHAREHOLDERS. A FEE MAY BE CHARGED FOR CERTAIN USES. UNDER SUBTITLE E, THE MORTENSENS LAGOON PARCEL WILL BE MANAGED AS A PART OF THE ALASKA PENINSULA NWR AND OPEN TO GENERAL PUBLIC USE AS DETERMINED BY THE SERVICE. SHAREHOLDERS OF THE KING COVE CORPORATION HAVE DETERMINED THAT CONVEYANCES OF THIS PARCEL AND LOSS OF EXCLUSIVE CONTROL OF PUBLIC USE TO FEDERAL OWNERSHIP IS ACCEPTABLE BECAUSE THERE WILL BE SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT.</p>

<p>KINZAROF LAGOON (2,604 ACRES)</p>	<p><b><u>OVERALL POSITIVE EFFECT ON PUBLIC USE:</u></b> THE KINZAROF LAGOON PARCEL IS PRIVATE LAND. THERE IS NO DIRECT ACCESS TO THE PARCEL BUT IT IS ACCESSIBLE BY ATV FOR SUBSISTENCE USE FROM THE HOVERCRAFT TERMINAL AT THE NORTHEAST CORNER OF COLD BAY ON THE EAST AND BY BOAT AND ATV FROM THE EXISTING COLD BAY ROAD NETWORK ON THE WEST. EXISTING PUBLIC USE OF KING COVE CORPORATION LAND IS AT THE EXCLUSIVE DISCRETION OF THE KING COVE CORPORATION AS DIRECTED BY SHAREHOLDERS. A FEE MAY BE CHARGED FOR CERTAIN USES. UNDER SUBTITLE E, THE KINZAROF LAGOON PARCEL WILL BE MANAGED AS A PART OF THE IZEMBek WILDERNESS WITH NO MOTORIZED ACCESS EXCEPT FOR QUALIFIED LOCAL RESIDENTS UNDER ANILCA. SHAREHOLDERS OF THE KING COVE CORPORATION HAVE DETERMINED THAT DONATION OF THIS PARCEL AND LOSS OF EXCLUSIVE CONTROL OF PUBLIC USE TO FEDERAL OWNERSHIP IS ACCEPTABLE BECAUSE THERE WILL BE SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT.</p> <p>UNDER ALTERNATIVES 1, 4, AND 5 THERE IS LONG-TERM POTENTIAL THAT THE UNIQUE POSITION OF THE PENINSULA BETWEEN THE KINZAROF LAGOON AND COLD BAY MAY BE DEVELOPED FOR COMMERCIAL RECREATION USE.</p>
<p>KING COVE CORPORATION RELINQUISHED SELECTION (5,430 ACRES)</p>	<p><b><u>OVERALL POSITIVE EFFECT ON PUBLIC USE UNDER ALTERNATIVES 2 AND 3:</u></b> THIS PARCEL IS REMOTE AND MANAGED AS PART OF THE IZEMBek WILDERNESS PENDING THE OUTCOME OF THE PROPOSED LAND EXCHANGE CONTEMPLATED BY SUBTITLE E, E.G., NO MOTORIZED ACCESS EXCEPT FOR QUALIFIED LOCAL RESIDENTS UNDER ANILCA. THE SERVICE MAINTAINS NON-MOTORIZED PUBLIC ACCESS FROM THE SHORE OF COLD BAY ACROSS KING COVE CORPORATION PRIVATE LAND TO A POINT ON THE WEST BOUNDARY OF THE WILDERNESS UNDER ANSCA SECTION 17(B). THE BOUNDARY OF THE WILDERNESS IS ALSO ACCESSIBLE BY ATV ACROSS THE PRIVATE LAND OWNED BY THE KING COVE CORPORATION. SHAREHOLDERS OF THE KING COVE CORPORATION HAVE DETERMINED THAT CONVEYANCE OF THIS PARCEL AND LOSS OF EXCLUSIVE CONTROL OF PUBLIC USE TO FEDERAL OWNERSHIP IS ACCEPTABLE BECAUSE THERE WILL BE SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT.</p> <p><b><u>OVERALL NEGATIVE EFFECT ON PUBLIC USE UNDER ALTERNATIVES 1, 4, AND 5:</u></b> UNDER THESE ALTERNATIVES, THE PENDING SELECTION OF THIS PARCEL WILL OCCUR. FUTURE PUBLIC USE OF KING COVE CORPORATION PRIVATE LAND IS AT THE EXCLUSIVE DISCRETION OF THE KING COVE CORPORATION AS DIRECTED BY SHAREHOLDERS. A FEE MAY BE CHARGED FOR CERTAIN USES. THE NON-MOTORIZED 17(B) PUBLIC ACCESS EASEMENT DISCUSSED ABOVE LIKELY WILL BE EXTENDED SEVERAL MILES TO THE RELOCATED WILDERNESS BOUNDARY ON THE EAST SIDE OF THE PARCEL. ATV ACCESS FROM THE EXISTING ROAD TO THE NORTHEAST CORNER OF COLD BAY IS LIKELY.</p>
<p>SITKINAK ISLAND (1,619 ACRES)</p>	<p><b><u>OVERALL POSITIVE EFFECT ON PUBLIC USE UNDER ALTERNATIVES 2 AND 3:</u></b> THE PARCEL IS ACCESSIBLE BY BOAT AND BY AIR. THE FORMER USCG STATION IS CLOSED TO PUBLIC USE. UNDER STATE OWNERSHIP, PUBLIC USE WILL BE SUBJECT TO STATE LAND USE PLANS. UNDER ALTERNATIVES 1, 4, AND 5, PUBLIC USE WILL NOT CHANGE WITH FUTURE PUBLIC USE DETERMINED BY THE SERVICE UNDER THE MARITIME REFUGE LAND USE PLAN.</p>
<p>KINZAROF LAGOON STATE WATERS AND SUBMERGED LAND (4,282 ACRES)</p>	<p><b><u>OVERALL NEUTRAL EFFECT ON PUBLIC USE:</u></b> ACCESS IS BY BOAT AND WILL REMAIN SO UNDER SUBTITLE E. MANAGEMENT OF THE KINZAROF LAGOON AS PART OF THE IZEMBek STATE GAME REFUGE MAY RESULT IN SOME RESTRICTIONS TO BOAT ACCESS TO COMPLEMENT STATE MANAGEMENT OF SIMILAR WATERS AND EELGRASS BEDS AND INTERTIDAL SHORELINE OF THE IZEMBek LAGOON COMPLEX.</p>

<p>BLINN LAKE (UNIDENTIFIED)</p>	<p><b><u>OVERALL NEUTRAL EFFECT ON PUBLIC USE:</u></b> THE BLINN LAKE PARCEL IS ROAD ACCESSIBLE. THE LAKE SERVES AS A SEAPLANE LANDING FACILITY. THE TYPE OF PUBLIC USE AND NUMBER OF VISITORS ARE NOT KNOWN. THE DEIS DOES NOT ADDRESS THE EXTENT, IF ANY, PUBLIC USE AT THE BLINN LAKE PARCEL WILL OR, WILL NOT, CHANGE WITH CONSTRUCTION OF THE WESTERN LINK OF ROAD CONSTRUCTED IN THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR WHEN THE PARCEL IS ADMINISTRATIVELY TRANSFERRED FROM MANAGEMENT AS PART OF THE ALASKA PENINSULA NWR TO MANAGEMENT AS PART OF THE IZEMBEK NWR.</p>
<p>SOUTHERN ROAD CORRIDOR (232 ACRES)</p>	<p><b><u>OVERALL POSITIVE EFFECT ON PUBLIC USE UNDER ALTERNATIVES 2 AND 3:</u></b> PARTS OF THE TWO ROAD CORRIDORS ARE ACCESSIBLE FROM EXISTING ROAD AND TRAILS ACCOMMODATING PUBLIC USE AND MOTORIZED TRAVEL IN THE IZEMBEK WILDERNESS FOR ACCESS TO SUBSISTENCE RESOURCES. PUBLIC ACCESS WILL BE SIGNIFICANTLY IMPROVED AS PART OF A SAFE, RELIABLE, AND AFFORDABLE WAY TO TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT. THIS ROAD WILL PROVIDE PUBLIC ACCESS TO AREAS OF THE IZEMBEK REFUGE THAT ARE NOW REMOTE.</p>
<p>CENTRAL ROAD CORRIDOR (262 ACRES)</p>	<p><b><u>OVERALL POSITIVE EFFECT ON PUBLIC USE UNDER ALTERNATIVES 2 AND 3:</u></b> PARTS OF THE TWO ROAD CORRIDORS ARE ACCESSIBLE FROM EXISTING ROAD AND TRAILS ACCOMMODATING PUBLIC USE AND MOTORIZED TRAVEL IN THE IZEMBEK WILDERNESS FOR ACCESS TO SUBSISTENCE RESOURCES. PUBLIC ACCESS WILL BE SIGNIFICANTLY IMPROVED AS PART OF A SAFE, RELIABLE, AND AFFORDABLE WAY TO TRAVEL BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT. THIS ROAD WILL PROVIDE PUBLIC ACCESS TO AREAS OF THE IZEMBEK REFUGE THAT ARE NOW REMOTE.</p>
<p>KING COVE REPLACEMENT LAND (5,430 ACRES)</p>	<p><b><u>OVERALL NEGATIVE EFFECT ON PUBLIC USE UNDER ALTERNATIVES 2 AND 3:</u></b> THE LOCATION OF THIS PARCEL IS SPECULATIVE AND UNKNOWN SINCE IT WILL BE FEDERAL OWNERSHIP MANAGED AS PART OF THE ALASKA PENINSULA NWR AS A REPLACEMENT FOR THE 5,430 ACRES OF KING COVE CORPORATION LANDS THAT ARE RELINQUISHED UNDER SUBTITLE E. IT IS LIKELY THESE LANDS WILL BE REMOTE AND HAVE A VERY LOW LEVEL OF PUBLIC USE. FUTURE PUBLIC USE OF KING COVE CORPORATION PRIVATE LAND IS AT THE EXCLUSIVE DISCRETION OF THE KING COVE CORPORATION AS DIRECTED BY SHAREHOLDERS. A FEE MAY BE CHARGED FOR CERTAIN USES.</p>

Many of the impacts to a resource described in the DEIS refer to the potential of more public use as a significant factor in determining whether the particular use will result in an increase vs. a redistribution of public use due to improved access.

## CONCLUSIONS

### THE KCG CONCLUDES --

- AS DISCUSSED IN THE PREVIOUS COMMENTS ON LAND USE, THE KCG AGREES THERE WILL BE AN OVERALL MAJOR POSITIVE EFFECT ON PUBLIC USE UNDER ALTERNATIVE 2 OR ALTERNATIVE 3.
- AREAS ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM WILL HAVE RESTRICTIONS ON PUBLIC USE OF MOTORIZED ACCESS; MOTORIZED ACCESS FOR SUBSISTENCE PURPOSES WILL CONTINUE IN ACCORD WITH THE PROVISIONS OF ANILCA.
- ADDITION TO, OR RETAINING, FEDERAL OWNERSHIP OF 16,126 ACRES OF PRIVATE LANDS, WILL HAVE A MAJOR POSITIVE EFFECT ON PUBLIC USE BECAUSE THE KING COVE CORPORATION WILL FOREGO FOREVER THE OPPORTUNITY TO HAVE EXCLUSIVE CONTROL OVER PUBLIC USE ON PRIVATE LANDS IN RETURN FOR A SAFE, RELIABLE, AND AFFORDABLE MEANS OF TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT.
- THERE IS NO CLEAR DISTINCTION BETWEEN AN INCREASE IN PUBLIC USE VS. A RE-DISTRIBUTION OF EXISTING AND PROJECTED PUBLIC USE FOR ACTIVITIES SUCH AS HUNTING WHERE BAG LIMITS ARE STRICTLY CONTROLLED BY EITHER THE FEDERAL GOVERNMENT OR THE STATE.

## RECOMMENDATIONS

### THE KCG RECOMMENDS --

- 48. THE FEIS INCLUDE A PROJECTION OF REASONABLY EXPECTED INCREASE, IF ANY, IN PUBLIC USE ON THE LANDS EXCHANGE WHERE OWNERSHIP IS PERMANENTLY CHANGED AS A DIRECT RESULT OF ALTERNATIVE 2 OR ALTERNATIVE 3.
- 49. THE FEIS DESCRIBE THE TOTAL EXPECTED HARVEST OF FISH AND WILDLIFE SPECIES TO SET THE CONTEXT OF ANY INCREASED HARVEST OF FISH AND WILDLIFE AND SUBSISTENCE RESOURCES AS A DIRECT RESULT OF ALTERNATIVE 2 OR ALTERNATIVE 3.

## CULTURAL RESOURCES

The DEIS assumes there are unknown unique cultural sites located within the Southern Road Corridor and the Central Road Corridor and that construction will have a moderate to major effect on potential cultural resources. The DEIS further assumes there will be uncontrolled excavation or looting or other damage to archaeological, historic and cultural properties.

The DEIS does not consider the actual effects on cultural resources that were discovered during construction of the authorized 17 mile road between the King Cove Airport and the hovercraft terminal at the northeast corner of Cold. The original surveyed 17 mile long road alignment was adjusted to avoid some identified cultural sites. In other cases The Corps required signing and fencing be placed around a site. In one case a site (at the material site (at the hovercraft terminal on northeast corner of Cold Bay) was determined to not be eligible for inclusion in the National Register and was destroyed with the concurrence of the SHPO, Corps and Service. The net result is that there has been no record of any uncontrolled excavation or looting or other damage to archaeological, historic and cultural properties as a direct or indirect result of constructing 17 miles of road across a remote area between the King Cove Airport to the northeast corner of Cold Bay.

The KCG is unaware of any uncontrolled excavation or looting or other damage to archaeological, historic and cultural properties as a direct, indirect, or indirect result of public access or maintenance of the 50 miles of road managed by the Service or from excavation of materials by the Service and others for road and airport maintenance. The KCG vehemently disagrees that uncontrolled activity will take place. Thye State, the Service, local government, and private land owners, have powers to protect these areas and there is no reason to suppose uncontrolled excavation will take place.

### CONCLUSIONS

#### THE KCG CONCLUDES --

- **THERE COULD BE UNDISCOVERED ARCHAEOLOGICAL, HISTORIC AND CULTURAL PROPERTIES IN THE 201 TO 227 ACRES THAT WILL BE TRANSFERRED FROM FEDERAL OWNERSHIP TO THE STATE FOR CONSTRUCTION OF A ROAD THAT PROVIDES SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT.**
- **APPLICATION OF THE PRACTICES USED TO LOCATE AND CONSTRUCT 17 MILES OF ROAD BETWEEN THE KING COVE AIRPORT AND THE NORTHEAST CORNER OF COLD BAY, THE HOVERCRAFT TERMINAL, AND THE MATERIAL SITE WILL HAVE SIMILAR EFFECT ON UNCONTROLLED EXCAVATION OR LOOTING OR OTHER DAMAGE TO ARCHAEOLOGICAL, HISTORIC AND CULTURAL PROPERTIES AS IDENTIFIED IN THE CORPS 2003 EIS WHICH WAS NEGLIGIBLE TO MINOR WITH "NO SIGNIFICANT ADVERSE EFFECT". ALTHOUGH THE 2003 EIS WAS LEAD BY THE CORPS, THE SERVICE WAS A FULL AND ACTIVE COOPERATOR IN ALL ASPECTS OF THE EIS EVALUATIONS.**
- **A ROAD LOCATED IN EITHER THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR WILL HAVE BOLLARD/CHAIN BARRIER ON EITHER SIDE OF THE ROAD WHICH PROVIDES A LAYER OF PROTECTION NOT FOUND IN THE 17 MILES OF ROAD TO THE NORTHEAST CORNER OF COLD BAY WHERE THERE HAS BEEN NO UNCONTROLLED EXCAVATION OR LOOTING OR OTHER DAMAGE TO ARCHAEOLOGICAL, HISTORIC AND CULTURAL PROPERTIES.**

**RECOMMENDATION**

**THE KCG RECOMMENDS --**

- 50. THE FEIS RE-EXAMINE THE DEIS CONCLUSION THERE WILL BE MODERATE TO MAJOR IMPACTS TO ARCHAEOLOGICAL, HISTORIC AND CULTURAL PROPERTIES WITH APPLICATION OF THE STANDARD MITIGATION MEASURES SUCCESSFULLY USED TO AVOID UNCONTROLLED EXCAVATION OR LOOTING OR OTHER DAMAGE TO ARCHAEOLOGICAL, HISTORIC AND CULTURAL PROPERTIES WHICH THE SERVICE, SHPO, AND CORPS DEEMED THE EFFECT TO BE ONLY "NEGLIGIBLE TO MINOR" WITH STANDARD MITIGATION (SEE CORPS 2003 EIS).
- 51. IN ORDER TO PROVIDE FLEXIBILITY TO AVOID DAMAGE TO ANY UNDISCOVERED ARCHAEOLOGICAL, HISTORIC AND CULTURAL PROPERTIES, THE SERVICE RE-EXAMINE ITS ADAMANT DETERMINATION THAT THE CENTER LINE DEVELOPED BY THE EIS CONTRACTOR AND PRELIMINARY DESIGN TO THE 35 PERCENT LEVEL FIRMLY FIXES THE EXTERNAL BOUNDARIES OF THE LAND TO BE TRANSFERRED TO THE STATE.

## ROAD SELECTION CRITERIA AND ROAD DESIGN IMPLICATIONS

The KCG, is a Cooperator and the separate entities are specifically listed in Subtitle E as having direct input to the location and design of a road that will provide safe, reliable and affordable transportation between the City of King Cove and the Cold Bay Airport. Further, the AEB has direct and applicable experience in the location, design, and operation of a single lane gravel road between the King Cove Airport and the northeast corner of Cold Bay. The KCG has consistently provided comments to the Service that are based on this actual road construction experience, most recently on December 23, 2011.

The FEIS needs to be clear on acreage and general location of the land that will be transferred from Federal ownership to the State. Subtitle E contemplates the minimum acreage of Federal ownership be transferred from the Izembek NWR to the State for the construction, operation, and maintenance of a single lane gravel road.

The KCG commends the Service for reconsidering its initial assertion that the maximum width of the road corridor as envisioned by Subtitle E could not exceed 60 feet to a standard width of 100 feet, or 50 feet on either side of the center line developed by the EIS consultant and evaluated in the DEIS. The DEIS identifies the acreage as an absolute transfer of Federal ownership to the State totaling 232 acres under Alternative 2 and 262 acres under Alternative 3. The Service has firmly stated that it has absolutely no intention to authorize any road construction or maintenance on Federal land adjoining either 100 foot wide road corridor. The Service has firmly stated the bollard/chain barrier on both sides of the road will be placed 10 feet beyond the toe of fill slope and 10 feet beyond ditch on the 6:1 slopes.

DEIS Table 2.4-2 indicates the maximum width of the road foot print under Alternative 2 will be 91 feet; 92 feet under Alternative 3 adding a minimum of 10 feet for a bollard/chain barrier system exceeds what KCG strongly believes is an arbitrary and capricious width of 100 feet established by the Service. The KCG has consistently advised the Service that an arbitrary and uniform width will not meet the requirement of Subtitle E for either transferring the minimum acreage to the State or the requirement that the land transferred be adequate for construction, operation, and maintenance.

**CONCLUSIONS****THE KCG CONCLUDES --**

- **THE APPLICATION OF A UNIFORM 100 FOOT WIDE CORRIDOR FOR THE CONSTRUCTION OF A ROAD IS AT ODDS WITH STANDARD PUBLIC HIGHWAY PRACTICE. THE KCG HAS CONSISTENTLY ADVISED THE SERVICE THAT A 100 FOOT UNIFORM WIDTH DOES NOT PROVIDE FOR THE CONSTRUCTION, OPERATION AND MAINTENANCE OF A ROAD THAT PROVIDES SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT. THE KCG HAS COMMENTED ON THIS ISSUE NUMEROUS TIMES, MOST RECENTLY ON DECEMBER 23, 2011.**
- **BASED ON THE ACTUAL DESIGN, LOCATION, AND CONSTRUCTION OF 17 MILES OF SINGLE LANE GRAVEL ROAD IN RESPONSE TO CONGRESSIONAL DIRECTIVES SIMILAR TO SUBTITLE E, THE KCG BELIEVES A ROAD CORRIDOR WITH AN AVERAGE BUT VARIABLE WIDTH OF 100 FEET WILL LIKELY BE ADEQUATE FOR CONSTRUCTION, OPERATION, AND MAINTENANCE OF A SAFE, RELIABLE AND AFFORDABLE MEANS OF TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT.**
- **A VARIABLE WIDTH CORRIDOR BASED ON THE FINAL DESIGN MAY RESULT IN LESS ACRES THAN THE ARBITRARY 100 FOOT WIDE CORRIDOR DISCUSSED IN THE DEIS.**
- **PLACEMENT OF THE BOLLARD/CHAIN BARRIER SYSTEM NOT FURTHER THAN 10 FEET FROM THE EDGE OF THE ROAD FOOTPRINT DOES NOT PROVIDE FOR EQUIPMENT OPERATION NECESSARY ROAD MAINTENANCE OF SIDE SLOPES OR DRAINAGE APPURTENANCES. THE KCG HAS COMMENTED ON THIS ISSUE NUMEROUS TIMES, MOST RECENTLY ON DECEMBER 23, 2011.**
- **CONSIDERING THE DEIS CENTERLINE AS A BASIS TO DETERMINE A SURVEYED BOUNDARY FOR THE ACTUAL BOUNDARY OF THE LAND TO BE TRANSFERRED TO THE STATE FOR CONSTRUCTION, OPERATION, AND MAINTENANCE OF A SAFE, RELIABLE AND AFFORDABLE MEANS OF TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT DOES NOT PROVIDE FLEXIBILITY TO AVOID UNDISCOVERED ARCHAEOLOGICAL, CULTURAL, AND HISTORIC RESOURCES THAT MAY BE LOCATED IN THE FOOTPRINT OF THE ROAD.**
- **THE FINAL DESIGN OF A ROAD LOCATED IN EITHER THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR SHOULD INCORPORATE A BALANCING OF CUTS AND FILLS. THE PROFILES SHOWN IN DEIS APPENDIX E DO NOT. Setting a profile that allows for cut and fills to balance is a standard road engineering practice. THE KCG HAS REPEATEDLY COMMENTED ON THIS ISSUE, MOST RECENTLY ON DECEMBER 23, 2011.**
- **THE FINAL DESIGN OF A ROAD LOCATED IN EITHER THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR SHOULD CONSIDER SNOW FENCES TO REDUCE THE WIDER FOOTPRINT CREATED WITH THE PROPOSED 6:1 CUT SLOPES.**
- **THE BOLLARD/CHAIN BARRIER SYSTEM ON BOTH SIDES OF THE ROAD SHOULD BE PLACED ON THE PROPERTY BOUNDARY BETWEEN THE STATE AND FEDERAL OWNERSHIP BECAUSE THE BOUNDARY IS THE MINIMUM AMOUNT OF LAND NEEDED TO CONSTRUCT, OPERATE, AND MAINTAIN A ROAD PROVIDING SAFE, RELIABLE, AND AFFORDABLE TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT. THE KCG HAS REPEATEDLY COMMENTED ON THIS ISSUE, MOST RECENTLY ON DECEMBER 23, 2011.**

**RECOMMENDATIONS****THE KCG RECOMMENDS --**

- 52. THE SERVICE INCLUDE IN THE FEIS EITHER A CONCEPTUAL FOOTPRINT FOR THE ENTIRE ALIGNMENT LOCATED IN THE SOUTHERN ROAD CORRIDOR AND IN THE CENTRAL ROAD CORRIDOR TO DETERMINE THE LIKELY WIDTHS OF THE LAND THAT WILL BE TRANSFERRED TO THE STATE THE FOR CONSTRUCTION, OPERATION, AND MAINTENANCE OF A SAFE, RELIABLE AND AFFORDABLE MEANS OF TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT TO ASSURE THAT ALL ROAD RELATED ACTIVITIES CAN BE RETAINED WITHIN STATE OWNERSHIP, OR
- 53. ALTERNATIVELY THE SERVICE CHANGE THE DESCRIPTION OF THE SOUTHERN ROAD CORRIDOR AND THE CENTRAL ROAD CORRIDOR AS A CORRIDOR THAT WILL BE AN AVERAGE OF 100 FEET IN WIDTH.
- 54. THE CENTERLINE DEVELOPED FOR THE DEIS MUST BE FLEXIBLE AND CAN BE ADJUSTED TO PROTECT UNDISCOVERED ARCHAEOLOGICAL, CULTURAL OR HISTORIC SITES, SELECTION OF THE BEST hydrologic SITE FOR STREAM CROSSINGS THAT MINIMIZE NEGATIVE EFFECTS TO ESSENTIAL FISH HABITAT AT STREAM CROSSINGS, AVOIDING BAD FOUNDATIONS, AND OTHER UNEXPECTED UNIQUE RESOURCES THAT OTHERWISE COULD HAVE BEEN AVOIDED.
- 55. THE BOLLARD/CHAIN BARRIER SYSTEM ON EITHER SIDE OF THE ROAD BE PLACED ON THE PROPERTY BOUNDARY, WHICH IS THE MINIMUM WIDTH NECESSARY FOR CONSTRUCTION, OPERATION, AND MAINTENANCE OF A SAFE, RELIABLE AND AFFORDABLE MEANS OF TRANSPORTATION BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT. THE KCG HAS COMMENTED ON THIS ISSUE NUMEROUS TIMES, MOST RECENTLY ON DECEMBER 23, 2011.
- 56. THE FEIS CONSOLIDATE AND LIST ALL THE MITIGATION MEASURES INTO A SINGLE TABLE.
- 57. THE FEIS CONSOLIDATE ALL THE SENSITIVE PERIODS OR OTHER LIMITATIONS TO CONSTRUCTION, OPERATION, MAINTENANCE, AND TRAVEL THAT WILL BE CONSIDERED IN THE RECORD OF DECISION AND THE SECRETARY OF THE INTERIOR DECISIONS ON THE CONTENT OF THE ENFORCEABLE MITIGATION MEASURES WHILE MEETING THE REQUIREMENT TO ALLOW FOR TIMELY CONSTRUCTION OF THE ROAD AS DIRECTED BY SUBTITLE E, SECTION 6403(e)(3)(C).

## MITIGATION MEASURES

Mitigation measures evaluated in the DEIS are primarily based on the protective measures incorporated in the Record of Decision based on the Corps 2003 EIS and subsequent permits by other entities for the construction of a road-hovercraft transportation system using a hovercraft terminal on the northeast corner of Cold Bay and one at Cross Wind Cove. Mitigations proposed for a road in the Southern Road Corridor (Alternative 2) apply equally to a road in the Central Road Corridor (Alternative 3).

Mitigation measures applied to a road constructed on the land transferred to the State located in either the Southern Road Corridor or the Central Road Corridor should also be adopted by the Service when comparable resources are associated with those 50 miles of existing road the Service administers that are located in the Izembek NWR and the Alaska Peninsula NWR. For example, the DEIS proposes there be an invasive plant species management plan. When KCG asked for a copy of the Service invasive species it was disclosed the Service does not have an invasive species plan for the 50 miles of road it administers in the Izembek NWR and the Alaska Peninsula NWR.

The following recommendations are provided for consideration as the FEIS is prepared.

### THE KCG RECOMMENDS --

- 58. THE FEIS ALSO ADDRESS THE VOLUNTARY ADOPTION OF ALL ENFORCEABLE MITIGATION MEASURES APPLIED TO THE STATE FOR THE CONSTRUCTION, OPERATION, AND MAINTENANCE OF A ROAD AND FOR TRAVEL IN EITHER THE SOUTHERN ROAD CORRIDOR OR THE CENTRAL ROAD CORRIDOR BY THE SERVICE FOR ALL ROADS IT ADMINISTERS IN THE IZEMBEK NWR AND THE ALASKA PENINSULA NWR. SIMILAR CONSTRAINTS ON HUMAN USE NEAR NESTING TRUMPETER SWANS OR OTHER SENSITIVE RESOURCES DURING CRITICAL LIFE CYCLE PERIODS SHOULD ALSO BE APPLIED.
- 59. MONITORING PLANS FOR WILDLIFE SPECIES, SUCH AS THE CARIBOU, WOLVERINE, AND OTHER FURBEARERS SHOULD BE BASED ON A SCIENTIFIC NEED AS DETERMINED BY THE RESPONSIBLE MANAGING AGENCY, E.G., THE STATE OF ALASKA. THESE TYPES OF AGREEMENT ARE CONTEMPLATED AND AUTHORIZED BY ANILCA.
- 60. THE SERVICE SHOULD CONSIDER ENTERING INTO A COOPERATIVE AGREEMENT WITH THE KING COVE CORPORATION TO PROVIDE ENVIRONMENTAL MONITORING ACTIVITY ON THE ENTIRE ROAD SYSTEM. A SIMILAR COOPERATIVE AGREEMENT SHOULD BE CONSIDERED BY THE SERVICE FOR LAW ENFORCEMENT WITH THE CITY OF KING COVE AND THE STATE.
- 61. THE SERVICE SHOULD CONSIDER THE EFFECTIVENESS OF THE ROAD SIDE SIGNING PROGRAM INDICATING TO THE PUBLIC AN ADJACENT AREA IS TEMPORARILY CLOSED BECAUSE OF NEARBY SPECIAL HABITAT. THE KCG SUGGEST THE SERVICE AND CORPS EVALUATE THE SUCCESSFUL SIGNING PROGRAM BEING USED BY THE NATIONAL PARK SERVICE FOR PROTECTING BROWN BEAR HIGH DENSITY USE AREAS DURING THE SPRING AND/OR FALL, MOOSE RUTTING, OR FOX/WOLF DENNING IN DENALI NATIONAL PARK AND PRESERVE RATHER THAN CLOSING THE ENTIRE STATE OWNED ROAD CORRIDOR TO SEVERAL CLASSES OF USERS SUCH AS HUNTERS AND WILDLIFE VIEWERS WHEN UNDER THE LEADERSHIP OF PROFESSIONAL GUIDES THAT COULD LOSE THEIR REPUTATIONS WITH A CLIENT VIOLATION OF AN ENFORCEABLE MITIGATION MEASURE REQUIRED BY THE SECRETARY OF THE INTERIOR.

Table 3. KCG Summary of Key Issues and Overall Beneficial, Negative, or No Effect Conclusions for Alternatives 1, 2, and 3 with Reference to Alternatives 4 and 5 <sup>a</sup>

ISSUE	ALTERNATIVE 1: NO LAND EXCHANGE	ALTERNATIVE 2: LAND EXCHANGE, SOUTHERN ROAD CORRIDOR	ALTERNATIVE 3: LAND EXCHANGE, CENTRAL ROAD CORRIDOR
<p><b><i>Purpose and Need</i></b></p> <p><u>Safe</u></p> <p><u>Reliable Med Evac</u></p> <p><u>Affordable (Capital Cost)</u></p> <p><u>Affordable (Operation Cost)</u></p> <p><u>Affordable (Travelers)</u></p> <p><u>Affordable (Trip Cost/Operational Cost per traveler) <sup>a</sup></u></p> <p><u>Quality of Life</u></p>	<p>Only when operated within designed regulatory limits of aircraft of marine vessel</p> <p>No Service King Cove Airport 55 day/yr; weather delay 91 days/yr No Service Cold Bay Airport up to 7 days/yr</p> <p>Unknown/Speculative</p> <p>Unknown/Speculative</p> <p>≤ 3,500</p> <p>≥\$100/no data</p> <p><b>No Change</b></p> <p><b>No</b></p>	<p>Yes</p> <p>24/7/365 days/yr; road closed up to 7 days/yr</p> <p>\$20,700,000</p> <p>\$90,000</p> <p>3,500</p> <p>\$45/\$40.80</p> <p>Major Positive Effect</p> <p><b>No</b></p>	<p>Yes</p> <p>24/7/365 days/yr; road closed up to 7 days/yr</p> <p>\$22,7000</p> <p>\$90,000</p> <p>3,500</p> <p>\$47/\$43.26</p> <p>Major Positive Effect</p>
<p><b><i>OVERALL ABILITY TO MEET THE PURPOSE AND NEED ESTABLISHED BY SUBTITLE E</i></b></p>	<p><b>NO</b></p>	<p><b>YES</b></p>	<p><b>YES</b></p>

<p><b>OVERALL EFFECT ON LAND OWNERSHIP</b></p>	<p>MAJOR NEGATIVE EFFECT TO UNIQUE 5,430 ACRES REMOVED FROM THE NATIONAL WILDERNESS PRESERVATION SYSTEM</p>	<p>MAJOR POSITIVE EFFECT BY ADDING 56,193 ACRES TO THE NATIONAL WILDLIFE REFUGE SYSTEM</p> <p>MAJOR POSITIVE EFFECT BY ADDING OR RETAINING 49,790 UNIQUE ACRES TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM</p> <p>MAJOR POSITIVE EFFECT TO 4,300 ACRES UNIQUE STATE WATER AND SUBMERGED LAND WITH 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE TO THE IZEMBEK STATE GAME REFUGE</p>	<p>MAJOR POSITIVE EFFECT BY ADDING 56,167 ACRES TO THE NATIONAL WILDLIFE REFUGE SYSTEM</p> <p>MAJOR POSITIVE EFFECT BY ADDING OR RETAINING 49,769 UNIQUE ACRES TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM</p> <p>MAJOR POSITIVE EFFECT TO 4,300 ACRES UNIQUE STATE WATER AND SUBMERGED LAND WITH 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE TO THE IZEMBEK STATE GAME REFUGE</p>
<p><b>OVERALL EFFECT ON SUBSISTENCE</b></p>	<p>NO EFFECT</p>	<p>MAJOR NEGATIVE EFFECT ON 16,126 ACRES TO KING COVE CORPORATION ALEUT SHAREHOLDERS TO HAVE EXCLUSIVE CONTROL OVER NON-SHAREHOLDER COMPETITION FOR SUBSISTENCE RESOURCES IN RETURN FOR AN ALL WEATHER SAFE, RELIABLE AND AFFORDABLE ROAD BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT</p>	<p>MAJOR NEGATIVE EFFECT ON 16,126 ACRES TO KING COVE CORPORATION ALEUT SHAREHOLDERS TO HAVE EXCLUSIVE CONTROL OVER NON-SHAREHOLDER COMPETITION FOR SUBSISTENCE RESOURCES IN RETURN FOR AN ALL WEATHER SAFE, RELIABLE AND AFFORDABLE ROAD BETWEEN THE CITY OF KING COVE AND THE COLD BAY AIRPORT</p>
<p><b>OVERALL EFFECT ON WETLANDS</b></p>	<p>MAJOR NEGATIVE EFFECT BY REMOVAL OF 1,917 ACRES OF WETLANDS FROM THE NATIONAL WILDERNESS PRESERVATION SYSTEM</p>	<p>MAJOR POSITIVE EFFECT BY ADDING 13,563 ACRES OF WETLANDS TO THE NATIONAL WILDLIFE REFUGE SYSTEM</p> <p>MAJOR POSITIVE EFFECT BY ADDING OR RETAINING 11,723 UNIQUE ACRES TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM</p> <p>MAJOR POSITIVE EFFECT BY ADDING 4,300 ACRES OF STATE WATERS AND SUBMERGED LAND INCLUDING 2,300</p>	<p>MAJOR POSITIVE EFFECT BY ADDING 13,554 ACRES OF WETLANDS TO THE NATIONAL WILDLIFE REFUGE SYSTEM</p> <p>MAJOR POSITIVE EFFECT BY ADDING OR RETAINING 11,714 UNIQUE ACRES TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM</p> <p>MAJOR POSITIVE EFFECT BY ADDING 4,300 ACRES OF STATE WATERS AND SUBMERGED LAND INCLUDING 2,300</p>

		<p>ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE TO THE IZEMBEK STATE GAME REFUGE. THE ENTIRE SHORELINE OF KINZAROF LAGOON WILL BE MANAGED UNDER THE MANDATES OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM. THE SHORELINE OF THE IZEMBEK LAGOON COMPLEX HAS A SUBSTANTIAL ACREAGE WITH PUBLIC AND SUBSISTENCE VEHICLE ACCESS TO THE SHORE; KINZAROF LAGOON WOULD NOT HAVE PUBLIC OR SUBSISTENCE VEHICLE ACCESS.</p>	<p>ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE TO THE IZEMBEK STATE GAME REFUGE. THE ENTIRE SHORELINE OF KINZAROF LAGOON WILL BE MANAGED UNDER THE MANDATES OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM. THE SHORELINE OF THE IZEMBEK LAGOON COMPLEX HAS A SUBSTANTIAL ACREAGE WITH PUBLIC AND SUBSISTENCE VEHICLE ACCESS TO THE SHORE; KINZAROF LAGOON WOULD NOT HAVE PUBLIC OR SUBSISTENCE VEHICLE ACCESS.</p>
<p><b>OVERALL EFFECT ON THREATENED AND ENDANGERED SPECIES -- STELLER'S EIDER</b></p>	<p><b>NO EFFECT</b></p>	<p>MAJOR POSITIVE EFFECT ON STELLER'S EIDER BY ADDING THE UNIQUE ISLANDS IN THE MOUTH OF KINZAROF LAGOON TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM AND THE UNIQUE BARS/SPITS TO THE SOUTHWEST OF THE KINZAROF LAGOON TO THE NATIONAL WILDLIFE REFUGE SYSTEM, BOTH AREAS DESIGNATED AS CRITICAL HABITAT. A MAJOR POSITIVE EFFECT WILL OCCUR WITH THE ADDITION OF THE 4,300 ACRES OF STATE WATER AND SUBMERGED LAND TOGETHER WITH 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE TO THE IZEMBEK STATE GAME REFUGE TO MANAGED LIKE THE STATE OWNERSHIPS COMPRISING THE IZEMBEK LAGOON COMPLEX. WHEREAS THE ENTIRE SHORE LINE OF KINZAROF LAGOON ABOVE MEAN HIGH TIDE WILL BE MANAGED AS WILDERNESS, THE LANDS ABOVE HIGH TIDE ON THE IZEMBEK LAGOON COMPLEX ARE NOT.</p> <p>AT THE 800 METER BUFFER FOR THE</p>	<p>MAJOR POSITIVE EFFECT ON STELLER'S EIDER BY ADDING THE UNIQUE ISLANDS IN THE MOUTH OF KINZAROF LAGOON TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM AND THE UNIQUE BARS/SPITS TO THE SOUTHWEST OF THE KINZAROF LAGOON TO THE NATIONAL WILDLIFE REFUGE SYSTEM, BOTH AREAS DESIGNATED AS CRITICAL HABITAT. A MAJOR POSITIVE EFFECT WILL OCCUR WITH THE ADDITION OF THE 4,300 ACRES OF STATE WATER AND SUBMERGED LAND TOGETHER WITH 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE TO THE IZEMBEK STATE GAME REFUGE TO MANAGED LIKE THE STATE OWNERSHIPS COMPRISING THE IZEMBEK LAGOON COMPLEX. WHEREAS THE ENTIRE SHORE LINE OF KINZAROF LAGOON ABOVE MEAN HIGH TIDE WILL BE MANAGED AS WILDERNESS, THE LANDS ABOVE HIGH TIDE ON THE IZEMBEK LAGOON COMPLEX ARE NOT.</p> <p>AT THE 800 METER BUFFER FOR THE</p>

		<p>SOUTHERN ROAD, NO DESIGNATED CRITICAL HABITAT IS INVADED. THE 1,500 METER BUFFER THAT IS IN COMMON WITH THE CENTRAL ROAD CORRIDOR ENCOUNTERS ABOUT ONE MILE OF DESIGNATED CRITICAL HABITAT IN THE IZEMBEK LAGOON COMPLEX AND A ABOUT 2 MILES OF DESIGNATED CRITICAL HABITAT IN KINZAROF LAGOON.</p>	<p>CENTRAL ROAD CORRIDOR, NO DESIGNATED CRITICAL HABITAT IS INVADED. THE 1,500 METER BUFFER ENCOUNTERS ABOUT 1.5 MILES OF DESIGNATED CRITICAL HABITAT AND HIGH DENSITY MOLTING HABITAT AND ANOTHER ONE MILE THAT IS IN COMMON WITH THE SOUTHERN ROAD CORRIDOR, BOTH IN THE IZEMBEK LAGOON COMPLEX. THE CENTRAL ROAD CORRIDOR DOES NOT INVADE DESIGNATED CRITICAL HABITAT IN KINZAROF LAGOON.</p>
<p><b>OVERALL EFFECT ON THREATENED AND ENDANGERED SPECIES -- KITTLITZ'S MURRELETS</b></p>	<p>POTENTIAL MAJOR NEGATIVE EFFECT TO THE EXTENT PART OF THE KING COVE CORPORATION RELINQUISHMENT HAS HABITAT SIMILAR TO THE SINGLE NEST OBSERVED ON FROSTY PEAK WILL BE REMOVED FROM THE NATIONAL WILDERNESS PRESERVATION SYSTEM.</p>	<p>POTENTIAL MAJOR POSITIVE EFFECT TO THE EXTENT PART OF THE KING COVE CORPORATION RELINQUISHMENT HAS HABITAT SIMILAR TO THE SINGLE NEST OBSERVED ON FROSTY PEAK AND IS RETAINED IN THE NATIONAL WILDERNESS PRESERVATION SYSTEM. SIMILAR POTENTIAL NESTING HABITAT IS LOCATED IN THE SOUTHEAST CORNER OF THE STATE PARCEL</p>	<p>POTENTIAL MAJOR POSITIVE EFFECT TO THE EXTENT PART OF THE KING COVE CORPORATION RELINQUISHMENT HAS HABITAT SIMILAR TO THE SINGLE NEST OBSERVED ON FROSTY PEAK AND IS RETAINED IN THE NATIONAL WILDERNESS PRESERVATION SYSTEM. SIMILAR POTENTIAL NESTING HABITAT IS LOCATED IN THE SOUTHEAST CORNER OF THE STATE PARCEL</p>
<p><b>OVERALL EFFECT ON THREATENED AND ENDANGERED SPECIES -- NORTHERN SEA OTTER</b></p>	<p>NO EFFECT</p>	<p>MAJOR POSITIVE EFFECT BY ADDITION OF THE ISLANDS IN THE MOUTH OF KINZAROF LAGOON TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM AS ARE 5 MILES OF UPLAND SHORELINE ON KINZAROF LAGOON. BARS AND SPITS TO THE SOUTHWEST OF KINZAROF LAGOON WOULD BE ADDED TO THE NATIONAL REFUGE SYSTEM. THE 4,300 ACRES OF STATE WATER AND SUBMERGED LAND COMPRISING KINZAROF LAGOON WITH ITS 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE WILL BE ADDED TO THE IZEMBEK STATE GAME REFUGE. KINZAROF LAGOON</p>	<p>MAJOR POSITIVE EFFECT BY ADDITION OF THE ISLANDS IN THE MOUTH OF KINZAROF LAGOON TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM AS ARE 5 MILES OF UPLAND SHORELINE ON KINZAROF LAGOON. BARS AND SPITS TO THE SOUTHWEST OF KINZAROF LAGOON WOULD BE ADDED TO THE NATIONAL REFUGE SYSTEM. THE 4,300 ACRES OF STATE WATER AND SUBMERGED LAND COMPRISING KINZAROF LAGOON WITH ITS 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE WILL BE ADDED TO THE IZEMBEK STATE GAME REFUGE. KINZAROF LAGOON</p>

		<p>WOULD HAVE ENHANCED PROTECTION TO DESIGNATED CRITICAL HABITAT BY HAVING THE ENTIRE SHORELINE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM; WHEREAS THE SHORELINE OF IZEMBOK LAGOON COMPLEX IS NOT.</p> <p>THE 1,500 METER BUFFER FOR THE SOUTHERN ROAD CORRIDOR ENCOUNTERS DESIGNATED CRITICAL HABITAT IN COMMON WITH THE CENTRAL ROAD CORRIDOR ENCOUNTERS ABOUT ONE MILE OF DESIGNATED CRITICAL HABITAT IN THE IZEMBOK LAGOON COMPLEX AND A ABOUT 2 MILES OF DESIGNATED CRITICAL HABITAT IN KINZAROF LAGOON.</p>	<p>WOULD HAVE ENHANCED PROTECTION TO DESIGNATED CRITICAL HABITAT BY HAVING THE ENTIRE SHORELINE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM; WHEREAS THE SHORELINE OF IZEMBOK LAGOON COMPLEX IS NOT.</p> <p>THE 1,500 METER BUFFER FOR THE CENTRAL ROAD CORRIDOR ENCOUNTERS DESIGNATED CRITICAL HABIT COMPLEX AND ANOTHER PART THAT IS IN COMMON WITH THE SOUTHERN ROAD CORRIDOR, BOTH IN THE IZEMBOK LAGOON COMPLEX.</p>
<p><i>OVERALL EFFECT ON OTHER SPECIAL STATUS SPECIES -- YELLOW-BILLED LOON, STELLER SEA LION, AND BALD EAGLE</i></p>	<p>NO EFFECT</p>	<p>NO EFFECT</p>	<p>NO EFFECT</p>
<p><i>OVERALL EFFECT ON EMPEROR GOOSE AND BRANT</i></p>	<p>NO EFFECT</p>	<p>MAJOR POSITIVE EFFECT BY ADDING THE 4,300 ACRES OF STATE WATER AND SUBMERGED LAND WITH 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE THAT IS HIGH DENSITY ABUNDANCE FOR STAGING AND WINTER HABITAT FOR EMPEROR GOOSE AND BRANT TO THE IZEMBOK STATE GAME REFUGE. MANAGEMENT OF KINZAROF LAGOON WOULD BE ENHANCED BECAUSE THE UPLAND SHORELINE WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM; WHEREAS THE SHORELINE OF THE IZEMBOK LAGOON COMPLEX IS NOT.</p>	<p>MAJOR POSITIVE EFFECT BY ADDING THE 4,300 ACRES OF STATE WATER AND SUBMERGED LAND WITH 2,300 ACRES OF EELGRASS HABITAT AND 17 MILES OF INTERTIDAL SHORELINE THAT IS HIGH DENSITY ABUNDANCE FOR STAGING AND WINTER HABITAT FOR EMPEROR GOOSE AND BRANT TO THE IZEMBOK STATE GAME REFUGE. MANAGEMENT OF KINZAROF LAGOON WOULD BE ENHANCED BECAUSE THE UPLAND SHORELINE WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM; WHEREAS THE SHORELINE OF THE IZEMBOK LAGOON COMPLEX IS NOT.</p>

		<p>MAJOR POSITIVE EFFECT BY ADDING THE KINZAROF LAGOON PARCEL WHICH INCLUDES ISLANDS IN THE MOUTH OF KINZAROF LAGOON AND SHORELINE ON BOTH THE KINZAROF LAGOON AND COLD BAY WILL BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM AND THE BARS/SPITS TO THE SOUTHWEST OF KINZAROF LAGOON TO THE NATIONAL REFUGE SYSTEM.</p>	<p>MAJOR POSITIVE EFFECT BY ADDING THE KINZAROF LAGOON PARCEL WHICH INCLUDES ISLANDS IN THE MOUTH OF KINZAROF LAGOON AND SHORELINE ON BOTH THE KINZAROF LAGOON AND COLD BAY WILL BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM AND THE BARS/SPITS TO THE SOUTHWEST OF KINZAROF LAGOON TO THE NATIONAL REFUGE SYSTEM.</p>
<p><b>OVERALL EFFECT ON TUNDRA SWAN</b></p>	<p>MAJOR NEGATIVE EFFECT BY REMOVING 3,800 ACRES OF UNIQUE HIGH DENSITY ABUNDANCE HABITAT AND HABITAT USED BY XX SWAN PAIRS AND NESTS WILL BE REMOVED FROM THE IZEMBEK WILDERNESS</p>	<p>MAJOR POSITIVE EFFECT BY ADDING 31,200 ACRES OF UNIQUE TUNDRA SWAN ABUNDANCE AND NESTING HABITAT. 27,100 ACRES WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM; 4,100 ACRES AS PART OF THE NATIONAL WILDLIFE REFUGE SYSTEM.</p> <p>NEGLIGIBLE EFFECT FOR THE 2 PAIRS OF SWAN PAIRS/NESTS WITHIN THE 1,500 METER BUFFER OF THE SOUTHERN ROAD THAT CANNOT BE SCIENTIFICALLY MEASURED WHEN CONSIDERING THE TOTAL TUNDRA SWAN HABITAT/NESTS IN THE IZEMBEK NATIONAL WILDLIFE REFUGE AND THE 130 MILE LONG AREA EXAMINED IN THE SERVICE IN THE 1998 LAND PROTECTION PLAN FOR THE IZEMBEK NATIONAL WILDLIFE REFUGE COMPLEX.</p>	<p>MAJOR POSITIVE EFFECT BY ADDING 31,200 ACRES OF UNIQUE TUNDRA SWAN ABUNDANCE AND NESTING HABITAT. 27,100 ACRES WILL BE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM; 4,100 ACRES AS PART OF THE NATIONAL WILDLIFE REFUGE SYSTEM.</p> <p>NEGLIGIBLE EFFECT FOR THE 2 PAIRS OF SWAN PAIRS/NESTS WITHIN THE 1,500 METER BUFFER OF THE CENTRAL ROAD THAT CANNOT BE SCIENTIFICALLY MEASURED WHEN CONSIDERING THE TOTAL TUNDRA SWAN HABITAT/NESTS IN THE IZEMBEK NATIONAL WILDLIFE REFUGE AND THE 130 MILE LONG AREA EXAMINED IN THE SERVICE IN THE 1998 LAND PROTECTION PLAN FOR THE IZEMBEK NATIONAL WILDLIFE REFUGE COMPLEX.</p>
	<p>MAJOR NEGATIVE EFFECT ON CARIBOU IN THAT 3,500 ACRES OF UNIQUE HIGH DENSITY WINTER USE AND MIGRATION HABITAT WILL BE REMOVED FROM THE IZEMBEK WILDERNESS.</p>	<p>MAJOR POSITIVE EFFECT ON CARIBOU BY ADDITION OF 51,400 ACRES OF UNIQUE HABITAT FOR CARIBOU WOULD BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM OR TO THE NATIONAL REFUGE SYSTEM. THIS</p>	<p>MAJOR POSITIVE EFFECT ON CARIBOU BY ADDITION OF 51,400 ACRES OF UNIQUE HABITAT FOR CARIBOU WOULD BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM OR TO THE NATIONAL REFUGE SYSTEM. THIS</p>

<p><i>OVERALL EFFECT ON CARIBOU</i></p>		<p>INCLUDES 36,000 ACRES OF UNIQUE CALVING HABITAT ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM. AN ADDITIONAL 7,300 ACRES OF HIGH DENSITY WINTER RANGE AND MIGRATION ALSO WILL BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM. 8,100 ACRES OF HIGH DENSITY WINTER USE AND MIGRATION HABITAT WILL BE ADDED TO THE NATIONAL REFUGE SYSTEM.</p> <p>THE A ROAD IN THE SOUTHERN ROAD CORRIDOR WILL HAVE LITTLE EFFECT ON CARIBOU MIGRATION OR TO ACCESS TO CARIBOU WINTERING HABITAT. THE BOLLARD-CHAIN BARRIER SYSTEM ON EITHER SIDE OF THE ROAD HAS BEEN DETERMINED BY THE SERVICE TO HAVE A LOW PROBABILITY OF DEFLECTING CARIBOU MIGRATIONS TO AND FROM THE CALVING AREA TO THE EAST OF THE IZEMBEK NATIONAL WILDLIFE REFUGE. THE POTENTIAL EFFECT OF THE BOLLARD-CHAIN BARRIER SYSTEM ON BOTH SIDE OF THE ROAD IS CONSIDERED BY THE SERVICE TO HAVE LOW PROBABILITY TO DEFLECT CARIBOU MIGRATION. THE SOUTHERN ROAD CORRIDOR PROVIDES GREATER UNRESTRICTED CARIBOU MIGRATION THAN DOES THE CENTRAL ROAD CORRIDOR.</p>	<p>INCLUDES 36,000 ACRES OF UNIQUE CALVING HABITAT ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM. AN ADDITIONAL 7,300 ACRES OF HIGH DENSITY WINTER RANGE AND MIGRATION ALSO WILL BE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM. 8,100 ACRES OF HIGH DENSITY WINTER USE AND MIGRATION HABITAT WILL BE ADDED TO THE NATIONAL REFUGE SYSTEM.</p> <p>THE A ROAD IN THE CENTRAL ROAD CORRIDOR WILL HAVE LITTLE EFFECT ON CARIBOU MIGRATION OR TO ACCESS TO CARIBOU WINTERING HABITAT. THE BOLLARD-CHAIN BARRIER SYSTEM ON EITHER SIDE OF THE ROAD HAS BEEN DETERMINED BY THE SERVICE TO HAVE A LOW PROBABILITY OF DEFLECTING CARIBOU MIGRATIONS TO AND FROM THE CALVING AREA TO THE EAST OF THE IZEMBEK NATIONAL WILDLIFE REFUGE. THE POTENTIAL EFFECT OF THE BOLLARD-CHAIN BARRIER SYSTEM ON BOTH SIDE OF THE ROAD IS CONSIDERED BY THE SERVICE TO HAVE LOW PROBABILITY TO DEFLECT CARIBOU MIGRATION. THE CENTRAL ROAD CORRIDOR PROVIDES LESSER UNRESTRICTED CARIBOU MIGRATION THAN DOES THE SOUTHERN ROAD CORRIDOR.</p>
<p><i>OVERALL EFFECT ON BROWN BEAR</i></p>	<p>MAJOR NEGATIVE EFFECT ON UNIQUE 5,000 ACRES OF HIGH DENSITY SPRING, SUMMER, FALL BROWN BEAR HABITAT AND 400 ACRES OF UNIQUE BROWN BEAR DENNING HABITAT WILL BE REMOVED FROM THE IZEMBEK WILDERNESS.</p>	<p>MAJOR POSITIVE EFFECT ON UNIQUE 1,000 ACRES OF BROWN BEAR DENNING HABITAT ADDED TO OR RETAINED IN THE NATIONAL WILDERNESS PRESERVATION SYSTEM. A TOTAL OF UNIQUE 48,700 ACRES OF IMPORTANT BROWN BEAR HABITAT WILL BE ADDED TO THE</p>	<p>MAJOR POSITIVE EFFECT ON UNIQUE 1,000 ACRES OF BROWN BEAR DENNING HABITAT ADDED TO OR RETAINED IN THE NATIONAL WILDERNESS PRESERVATION SYSTEM. A TOTAL OF UNIQUE 48,700 ACRES OF IMPORTANT BROWN BEAR HABITAT WILL BE ADDED TO THE</p>

		NATIONAL WILDERNESS PRESERVATION SYSTEM; AN ADDITIONAL 8,100 ACRES OF IMPORTANT BROWN BEAR HABITATS WILL BE ADDED TO THE NATIONAL WILDLIFE REFUGE SYSTEM.	NATIONAL WILDERNESS PRESERVATION SYSTEM; AN ADDITIONAL 8,100 ACRES OF IMPORTANT BROWN BEAR HABITATS WILL BE ADDED TO THE NATIONAL WILDLIFE REFUGE SYSTEM.
<b>OVERALL EFFECT ON FISH HABITAT AND FISH POPULATIONS</b>	MAJOR NEGATIVE EFFECT IN THAT UNIQUE FISH HABITAT WILL BE REMOVED FROM THE IZEMEK WILDERNESS WHEN THE 5,430 ACRES TRANSFERRED TO THE KING COVE CORPORATION.	NO NET LOSS OF ESSENTIAL FISH HABITAT IDENTIFIED IN THE DEIS. POTENTIAL OVERFISHING OF FISH STREAMS CROSSED. NO FISH STREAMS ENTERING IZEMBEK LAGOON COMPLEX CROSSED.  NO SCIENTIFIC DATA PRESENTED ON THE POTENTIAL FOR OVERFISHING GIVEN THE OVERALL DISTANCE FROM KING COVE AND FROM COLD BAY THAT REQUIRES CROSSING STREAMS WITH MORE FISH PRESENT THAN IN THE STREAMS CROSSED.	NO NET LOSS OF ESSENTIAL FISH HABITAT IDENTIFIED IN THE DEIS. POTENTIAL OVERFISHING OF FISH STREAMS CROSSED. ONE FISH STREAM ENTERING IZEMBEK LAGOON COMPLEX CROSSED AS ARE SEVERAL STREAMS IN COMMON TO BOTH THE SOUTHERN AND CENTRAL ROAD CORRIDORS.  NO SCIENTIFIC DATA PRESENTED ON THE POTENTIAL FOR OVERFISHING GIVEN THE OVERALL DISTANCE FROM KING COVE AND FROM COLD BAY THAT REQUIRES CROSSING STREAMS WITH MORE FISH PRESENT THAN IN THE STREAMS CROSSED.
<b>PUBLIC ACCESS</b>	MAJOR NEGATIVE EFFECT ON PUBLIC ACCESS WHEN 5,430 ACRES OF THE UNIQUE IZEMBEK WILDERNESS WILL BECOME PRIVATE LAND OWNED BY THE KING COVE CORPORATION. THE KING COVE CORPORATION WILL SELECT 5,430 ACRES OF NON-WILDERNESS LAND IN THE ALASKA PENINSULA NATIONAL WILDLIFE REFUGE THAT THE ALEUT SHAREHOLDERS HAVE EXCLUSIVE CONTROL OVER PUBLIC ACCESS AND THE EXTENT THAT FEES MAY BE CHARGED.	MAJOR POSITIVE EFFECT ON PUBLIC RECREATION IN ADDING 58,000 ACRES TO THE NATIONAL REFUGE SYSTEM. 16,126 ACRES OF PRIVATE LAND WILL BE ADDED TO THE NATIONAL WILDLIFE SYSTEM AND THE NATIONAL WILDERNESS PRESERVATION SYSTEM. OVERALL, THERE WILL BE A NEGATIVE EFFECT ON EXISTING PUBLIC ACCESS AS 49,900 ACRES OF NON-FEDERAL LANDS ARE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM WITH RESTRICTED MOTORIZED ACCESS.  THE ALEUT SHAREHOLDERS HAVE DETERMINED THAT FORGOING EXCLUSIVE CONTROL OVER PUBLIC ACCESS TO LANDS AND SELECTIONS WITH	MAJOR POSITIVE EFFECT ON PUBLIC RECREATION IN ADDING 58,000 ACRES TO THE NATIONAL REFUGE SYSTEM. 16,126 ACRES OF PRIVATE LAND WILL BE ADDED TO THE NATIONAL WILDLIFE SYSTEM AND THE NATIONAL WILDERNESS PRESERVATION SYSTEM. OVERALL, THERE WILL BE A NEGATIVE EFFECT ON EXISTING PUBLIC ACCESS AS 49,900 ACRES OF NON-FEDERAL LANDS ARE ADDED TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM WITH RESTRICTED MOTORIZED ACCESS.  THE ALEUT SHAREHOLDERS HAVE DETERMINED THAT FORGOING EXCLUSIVE CONTROL OVER PUBLIC ACCESS TO LANDS AND SELECTIONS WITH

		<p>UNIQUE SUBSISTENCE RESOURCES IS IN THE PUBLIC INTEREST OF THE SHAREHOLDERS IN RETURN FOR AN ALL WEATHER ROAD CONNECTING THE CITY OF KING COVE TO THE COLD BAY AIRPORT.</p>	<p>UNIQUE SUBSISTENCE RESOURCES IS IN THE PUBLIC INTEREST OF THE SHAREHOLDERS IN RETURN FOR AN ALL WEATHER ROAD CONNECTING THE CITY OF KING COVE TO THE COLD BAY AIRPORT.</p>
<p><i>PUBLIC RECREATION</i></p>	<p>MAJOR NEGATIVE EFFECT ON PUBLIC ACCESS WHEN 5,430 ACRES OF THE UNIQUE IZEMBEK WILDERNESS WILL BECOME PRIVATE LAND OWNED BY THE KING COVE CORPORATION. THE KING COVE CORPORATION WILL SELECT 5,430 ACRES OF NON-WILDERNESS LAND IN THE ALASKA PENINSULA NATIONAL WILDLIFE REFUGE THAT THE ALEUT SHAREHOLDERS HAVE EXCLUSIVE CONTROL OVER PUBLIC ACCESS AND THE EXTENT THAT FEES MAY BE CHARGED.</p>	<p>NO EFFECT. THE KCG RECOGNIZES THERE WILL BE A RE-DISTRIBUTION OF EXISTING USE AS A DIRECT RESULT OF THE ROAD CORRIDOR IN ALTERNATIVE 2. HOWEVER, THERE ARE NO DATA THE LAND EXCHANGE WILL RESULT IN AN INCREASE IN PUBLIC RECREATION OVER UNIDENTIFIED EXPECTED PROJECTION OF PUBLIC RECREATION WITHOUT THE LAND EXCHANGE. IN THE UNDOCUMENTED SCENARIO IN THE DEIS THERE WILL BE A TOTAL INCREASE IN PUBLIC RECREATION WITH ADVERSE EFFECT ON WATERFOWL AND MAMMAL POPULATIONS IN THE IZEMBEK NATIONAL WILDLIFE REFUGE. THERE IS NO INDICATION THE INCREASE IS NOT WITHIN THE EXCLUSIVE CONTROL OF THE SERVICE FOR THE ANNUAL REMOVAL OF SPECIES CONTROLLED BY THE MIGRATORY BIRD TREATY ACT AND THE REGULATORY AUTHORITY OF THE SERVICE TO MANAGE THE HARVEST OF WILDLIFE FOR SPORT AND SUBSISTENCE PURPOSES. ACCESS IT THE KINZAROF LAGOON SHORELINE BY MOTORIZED VEHICLE IS PROHIBITED SINCE THE UPLANDS ARE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM.</p>	<p>NO EFFECT. THE KCG RECOGNIZES THERE WILL BE A RE-DISTRIBUTION OF EXISTING USE AS A DIRECT RESULT OF THE ROAD CORRIDOR IN ALTERNATIVE 3. HOWEVER, THERE ARE NO DATA THE LAND EXCHANGE WILL RESULT IN AN INCREASE IN PUBLIC RECREATION OVER UNIDENTIFIED EXPECTED PROJECTION OF PUBLIC RECREATION WITHOUT THE LAND EXCHANGE. IN THE UNDOCUMENTED SCENARIO IN THE DEIS THERE WILL BE A TOTAL INCREASE IN PUBLIC RECREATION WITH ADVERSE EFFECT ON WATERFOWL AND MAMMAL POPULATIONS IN THE IZEMBEK NATIONAL WILDLIFE REFUGE., THERE IS NO INDICATION THE INCREASE IS NOT WITHIN THE EXCLUSIVE CONTROL OF THE SERVICE FOR THE ANNUAL REMOVAL OF SPECIES CONTROLLED BY THE MIGRATORY BIRD TREATY ACT AND THE REGULATORY AUTHORITY OF THE SERVICE TO MANAGE THE HARVEST OF WILDLIFE FOR SPORT AND SUBSISTENCE PURPOSES. ACCESS IT THE KINZAROF LAGOON SHORELINE BY MOTORIZED VEHICLE IS PROHIBITED SINCE THE UPLANDS ARE MANAGED AS PART OF THE NATIONAL WILDERNESS PRESERVATION SYSTEM.</p>

<sup>a</sup> ALTERNATIVE 4 AND 5 HAVE THE SAME EFFECT ON LAND OWNERSHIP AND RESOURCES AS SHOWN FOR NO ALTERNATIVE 1 (NO ACTION). THE MAJOR DIFFERENCES ARE A VERY HIGH OPERATING COST AND LOW RIDERSHIP WHEN COMPARED TO ALTERNATIVES 2 AND 3.

**ATTACHMENT 2**

**King Cove’s Need for a Road to the Cold Bay Airport**

**Our Roots Are Deep**

Archaeologists have located human remains that suggest that the indigenous people of this region, we call ourselves Unangan, have history that dates back 4000 years.

Izembek got its name from a Russian count, one of many Russian traders to invade the coastline in the late 1800s, with voracious appetites for sea otter pelts. Indigenous people were enslaved to feed those appetites.

Unable to say Unangan, we were renamed ..... Aleuts.

The modern community of King Cove traces its origins to the late 1800s with the arrival of English immigrant Robert King who married a local woman and moved to the Cove to make a home for his family. Of the 10 founding families, 5 were comprised of a European husband and Aleut wife.

The present structure of the community and its economy extends back to 1911 when Pacific American Fisheries built a salmon cannery and members of Aleut and Yupik tribes came to find work.

**“The proposed road from King Cove to Cold Bay across the Izembek National Wildlife Refuge, as touted by Don Young and Frank Murkowski, is an absurdity, and tying it to health and safety considerations for King Cove residents is no more than a diversion from the true purpose, which is easy access to the fish and game in the Cold Bay area and en route.”**

Robert P. Spinde  
Ltr to Anch Daily News  
7/4/98

**By**

**Gary Hennigh, City Manager, City of King Cove, Alaska**

January 2011 (updated May 2012)

### Project History

This history summarizes six decades of events, legislative actions and human hopes for a road to connect the City of King Cove with the Cold Bay Airport. This history is about perseverance, politics, misunderstandings, and an evolving hard-fought campaign for permission to build a road that for seven miles will cross a federal Refuge.

This section has been written from the perspective of the City of King Cove. The current city administrator has thirty years of direct involvement in helping King Cove and its partners to achieve a road. Twenty of these years have been during his tenure as the city's administrator (1989-present). Prior to this, he was involved in this capacity as a senior-level employee with the State of Alaska Department of Transportation and Public Facilities (1981-1983).

What follows is a summary of the significant chronological events and decisions which form the political and legislative underpinnings of this road debate. They reveal how this project rose to a level of national and state prominence for more than 15 years. This account supplements and expands the project's history as documented in the 2003 King Cove Access Project EIS.

As with most histories, the background of this one is inexorably linked to other histories: those of an Aleut culture and community, the war time location of an airport, and three subsequent acts of Congress. The first act created the Izembek National Wildlife Refuge (Refuge) on Alaskan soil, a place which is a living, breathing example of what conservation looks like when sustained over many centuries. The second was the Senate's approval and ultimate compromise of the *King Cove Health & Safety Act of 1998*. The third was the *Omnibus Public Lands Act of 2009* which authorized the possibility of a major, unprecedented land exchange for a modest road corridor through wilderness land in the Refuge.

#### 1940 – 1960 (The War Years and Beyond)

The history of the airport begins with World War II. Facing the realized threat of a Japanese invasion in the western Aleutian Islands, the push was on by the United States to quickly and quietly construct an air base where fighter pilots could rest and refuel for reconnaissance missions to the Aleutian Islands. Cold Bay was chosen and Fort Randall was hastily constructed to house troops in order to provide support for the mission, which was to rout the Japanese from US soil. Thousands of troops were stationed there by the end of the war. Roads were pushed through as necessary and became prolific in the area.

Many of the construction materials for the Cold Bay Airport arrived on steam ships too large to safely anchor and off-load in Cold Bay. Instead, ships offloaded in King Cove and materials were stored in the cannery building until smaller landing crafts and local residents delivered them to Cold Bay in an often-difficult three-hour journey by boat. Military personnel took up residence in the cannery to coordinate these efforts.

Aleuts worked as laborers to help construct the airstrip. Elders in King Cove can still

recall working long days, remembering a sense of urgency and pride in playing such a strategic role in America's war effort. Residents remember conversations with Army engineers talking about pushing a road through to King Cove but it never materialized. Other infrastructure was built however, as noted in this quote from the Corps of Engineers report on use of Cold Bay during the war: "At King Cove, considered a part of Cold Bay, repair facilities for small craft were constructed, including a 150-ton marine railway and an adjacent machine shop. Diesel-oil storage was in tanks totaling 65,000 gallon capacity."

The war ended with the total victory of the Allies over Germany and Japan in 1945.

In September 1949, King Cove became an incorporated city in the Territory of Alaska. King Cove was about the 20<sup>th</sup> community to be incorporated at this point in the state's history. Given its population of around 250 people and its remote access, this was a noteworthy accomplishment.

By 1953, the military had deactivated the Aleutian airfields. Soon after, Reeve Aleutian Airways (RAA) saw an opportunity to begin passenger and cargo service to Cold Bay and a number of other Aleutian Islands and Alaska Peninsula communities.

On July 7, 1958 Congress passed the *Alaska Statehood Act* accepting Alaska as the 49th state on January 3, 1959.

### 1960-1980

King Cove continued to grow and expand in these decades. RAA provided air service to the community, using a Gruman Goose on floats. The severity of the weather, particularly high winds, frequently prevented the Gruman from landing either on the bay in front of or in the lagoon behind the community. A permanent airstrip to accommodate wheeled aircraft was a City priority by the late 1960s.

The community's first Comprehensive Plan noted that: "In King Cove there are no cars, nor is there currently any need for such land transportation systems as streets and highways. The construction of the airstrip five miles from town will change the ambulatory pattern of King Cove living, however, since the distance to the airstrip is too great for walking while carrying baggage."

Spanning the construction seasons of 1969 and 1970, the State built a small 3,500 gravel runway in the Delta Creek Valley five miles north of the community. The location was the only available piece of land for an airstrip to serve the growing population of King Cove, but its geography was problematic from the start. Positioned in a narrow valley between volcanic mountains, it had Belkofski Bay to the south and Lenard Harbor to the north, challenging pilots with both a rugged topography and the perfect funnel for the region's legendary winds.

A connecting road from King Cove to the new airstrip was part of the project. The need for automobiles followed as a natural solution for residents needing access to the airstrip. As noted above this need had been predicted in the community's first Comprehensive Plan.

While decisions about Izembek were underway in Washington D.C., Aleut residents from King Cove and the then-viable Belkofski community, were walking the lands of the Izembek, as their grandfathers had before them. They subsistence hunted and gathered, using in part the existing military road system. From these excursions, their dream of a road was reinforced – it seemed completely plausible to utilize the roads and trails left behind by the military, and by adding to them, connect King Cove to the Cold Bay Airport. What they could never have imagined was that permission for such a road would require a thirty year journey to Washington D.C., hundreds of thousands of dollars, acres of their ancestral lands, and an act of Congress, just to begin.

While local support for the road was progressing, in Washington D.C. decisions that would profoundly affect the project were underway. Foremost among these was the creation of the Izembek National Wildlife Range per a Presidential Executive Order, signed December 6, 1960. Then in 1964, the *Wilderness Act* passed. It defined the management policy for the entire National Wilderness Preservation System of which Izembek Wilderness is a part.

In the late 1960s and early 1970s, oil was discovered in Prudhoe Bay on Alaska's North Slope. The dream of an oil pipeline that would traverse the 800 miles from Prudhoe Bay to a deep-water port in Valdez was taking shape. Leaders understood that a pipeline could never become a reality, without first resolving thousands of private and public land ownership issues, many of them contentious and disputed claims between the State of Alaska and indigenous Native land users. Provisions of the *Alaska Statehood Act* added to the confusion.

To address this uncertainty, in 1971 Congress passed the *Alaska Native Claims Settlement Act ("ANCSA")*. ANCSA created regional and village Native-owned corporations and authorized these corporations to select 44 million acres of federal lands in Alaska. It was an ambitious effort to resolve all claims and convey quiet title to the thousands of acres that comprised traditional subsistence hunting and gathering grounds of Native Alaskans. As a result, the pipeline project was enabled to move forward.

ANCSA authorized the King Cove Village Corporation (KCC) to select around 100,000 acres of federal land in and around the community, as well as traditional subsistence lands in the what is now the Alaska Peninsula and Izembek National Wildlife Refuges. However, some of these selections became problematic when they conflicted with the newly proposed "wilderness" land status, the result of the 1971 National Wilderness System legislation.

Public comment on the "wilderness" designation was solicited and two hearings were conducted in May 1971 that addressed the Izembek area, one in Anchorage and one in Cold Bay. There is nothing in the available record to substantiate that any outreach effort was made or notice sent to city or Aleut tribal leaders or the general public in King Cove. Nor does the available record suggest any other tribal representatives for the area, or any other native community in the area most directly affected by the proceedings, were notified. Many of the testifiers represented governmental interests intent on assuring for the record that Izembek was not an area known for its mineral or oil deposits, thereby classifying the region as

“non-mineral in nature.”

However, at the hearing in Cold Bay, local resident Robert Livingston stated, “I only had one question and that is the future possibilities of King Cove. King Cove and Cold Bay are sort of close relatives. Would it be possible to build a road between the two if it ever became desirable through the wilderness area?” The federal government’s representative replied, “If the area was established as a wilderness in order for a public road to be established through it, it would require a Congressional modification. He further said that “it (road) could be included as a provision of the establishment of a wilderness area. Yes.”

Then State of Alaska Commissioner of Highways, Robert Beardsley, provided written testimony encouraging federal overseers to create a road corridor exclusion thereby allowing a road to be built at some future date between the two communities. This idea was rejected as not having “local support” and because the State was unable to provide sufficient detail about their plans to build this road.

Roads that were allowed to continue to exist were defined as “the primary road system located within the area excluded from the proposed wilderness area.” The boundaries of the refuge were then carefully drawn so as to stay away from those roads so that wilderness management in the Izembek National Wildlife Refuge would not interfere with current airport operations or future expansions. At the same time, the Service cherry stemmed the Frosty Creek Road so that the boundaries of the Izembek Wilderness are immediately adjacent to the road while other trails used for subsistence were included.

The community of King Cove continued to grow. With that growth came the need for improved schools and more community infrastructure. This prompted the community, in 1974, to pursue first class status as defined by State statute and to hire their first professional city manager in 1976. Also in 1976, the City passed its first formal resolution in support of a road connection to the Cold Bay Airport.

Then in 1979, the King Cove airstrip experienced its first airplane crash attributable to bad weather. The single-engine plane landed short of the King Cove runway. Fortunately, no one died but passengers and pilot were injured. This crash reminded local residents of the perilous topography and ever-changing weather surrounding the Delta Creek Valley airstrip.

#### 1980- 1995

In the early 1980s, residents experienced two fatal crashes which killed ten people. Both crashes were due to bad weather. These tragedies significantly increased residents’ apprehension of flying in and out of the King Cove air corridor connecting to the Cold Bay Airport.

The crash in 1980 was a medivac flight from King Cove to Cold Bay. A fisherman had his foot severed when a crab pot fell on him. The assessment was that he would bleed to death unless he could be transported to Anchorage fast. The only nurse in town, along with

an assistant, boarded the injured fisherman, and the pilot took off from King Cove in blizzard conditions. They crashed before reaching the Cold Bay Airport, with their connecting medivac flight already en route to the Cold Bay tarmac.

Less than a year later, a charter flight searching for the King Cove airstrip, went down in the mountains adjacent the airstrip. All six on board died. Again, bad weather (fog and rain) in the vicinity was blamed for the crash.

In 1980, President Jimmy Carter signed the *Alaska National Lands Interest Conservation Act* ("ANILCA"). This Act officially designated as "wilderness" about 300,000 acres of what would be renamed the Izembek National Wildlife Refuge.

In 1981, the City published its first city-authored Comprehensive Plan, which identified a road link to the Cold Bay Airport as a priority for the community. The Alaska Department of Transportation/ Public Facilities ("DOT/PF") pursued the initial funding for this road reconnaissance study. However, this study was not funded at that time.

In 1982, Cold Bay incorporated as a second-class city. Today, the community remains generally as it was described in the US Bureau of Sport Fisheries & Wildlife Izembek Wilderness Proposal of 1970 – a town that developed after World War II and functions primarily as an aircraft service stop. Since that time employees from other federal agencies, i.e. Refuge rangers overseeing the Refuge, FAA, and NOAA, have been stationed in Cold Bay.

The Bristol Bay Regional Management Plan/EIS began in 1985. This was an ANILCA-required report on current and future federal land uses in the Bristol Bay region that was to include the Alaska Peninsula communities. The report was to have been written in consultation with the State of Alaska, however the State withdrew from the study and the Record of Decision was never finalized. The Department of Interior issued its report nonetheless, in which a 32-mile road connecting King Cove and Cold Bay communities was considered. The road as envisioned then is similar to the same low-impact road that is proposed now: "The gravel road was to be constructed to Alaska secondary highway standards and have a right-of-way of about 200 feet. An estimated footprint of 805 acres, including 30 acres of borrow pits, would have been required. The road would have crossed approximately 7 miles of Congressionally- designated Wilderness area, located within the boundaries of the Izembek NWR."

Similarly, the Izembek Refuge in 1985 was also the subject of a Comprehensive Conservation Plan. Summarized testimony from governmental and interested parties are included in the report. The State's position encouraged the parties to adopt "a liberal approach to public access." The State voiced strong objections to inconsistencies between the Izembek Plan and the Bristol Bay Comprehensive Management Plan ("BBCMP"), particularly on their determination that a road from Cold Bay to King Cove was incompatible with refuge purposes. The State asked Service to stop short of an incompatibility determination and instead allow the processes established by ANILCA Title XI and National Environmental Policy Act ("NEPA") to control. The State specifically noted: "Further, the refuge plan should

acknowledge some of the legitimate reasons for considering a road, including the poor access to King Cove during the frequent periods of bad weather. A number of fatal air crashes have been attributed to this poor access, and medical evacuations from King Cove have, at times, been impossible.”

Testimony was solicited from the King Cove Corporation, but not from the City of King Cove. In a letter signed by Harvey Mack on behalf of King Cove Corporation, he states: “I am writing in response to the conference that was held in King Cove earlier this month. I feel that Fish & Wildlife should keep their comprehensive refuge plan down to a minimal refuge plan. I would also like to see this corporation having some/more say so as to the lands that are selected.”

In 1989 the city’s current administrator was hired. At his first City Council meeting in December, the council informed him that one of their highest community priorities was a road connection to the Cold Bay Airport. The city administrator working with its consultant city engineer (Duane Hippe, Vice President of HDR Alaska) was successful in convincing DOT/PF to conduct an initial road reconnaissance study using “special case study” funding from the 1991 federal highway funding bill, entitled: *Intermodal Surface Transportation Efficiency Act (ISTEA)*.

In 1990, a plane crashed northwest of the King Cove airstrip, in the mountains that surround Lenard Harbor, the narrow passageway leading to the airstrip, killing the pilot. There were no other passengers on board. Again, weather was the factor that forced the pilot to discontinue flying through this passageway (Lenard Harbor), and when he tried to climb out of it he crashed about 20 feet from clearing the mountainside.

By the end of 1994, DOT/PF completed a draft of the ISTEA-funded case study. The study concluded that federal highway funding for a road connection between the port community of King Cove and the Cold Bay Airport was an excellent example of how to use this funding to achieve “multi-modal connectivity.” This study’s focused on both the economic benefits of this potential transportation link, as well as general transportation accessibility issues that faced King Cove residents.

King Cove officials and residents were now starting to believe that their long awaited road connection to the Cold Bay Airport might be about to happen.

#### 1995 - 2004

In 1995, in a speech to the Anchorage Chamber of Commerce and covered as front page news in the Anchorage Daily News, Governor Tony Knowles announced his support for a road from King Cove to the Cold Bay Airport. This announcement was part of his speech, entitled “A Transportation Plan for Alaska’s Future.” The Governor used this road as one of three rural Alaska transportation projects which his new Administration supported. He explained that a road would boost local and state economies by getting Alaska’s premium seafood more quickly to an international market. This speech planted in some minds the idea that the predominant reason for the road was a commercial one, this in spite of King Cove’s consistent

position that dependable airport access was a quality-of-life issue and their focus was health and safety. Unfortunately, the theory that King Cove was a pawn for Peter Pan Seafoods became a key component in the national campaign that was later waged to halt the legislation. To this day, Peter Pan Seafoods has never requested or supported an official position on a road connection to the Cold Bay Airport.

The City of King Cove responded immediately to the Governor' Office and DOT/PF within a day of his speech and offered a local match to state funding in order to quickly begin a detailed project assessment. The city was also able to garner financial participation from the Aleutians East Borough and City of Cold Bay. With City of King Cove as lead, city leaders grew ever more optimistic that previous advocacy efforts, in conjunction with the ISTEPA case study, were coming to fruition.

Months later, however, in a disheartening blow to the City of King Cove and AEB, Governor Knowles withdrew his support for the project, allegedly out of a concern that he would alienate environmental groups if he continued to advocate for the project. His concern was reportedly due to the unprecedented possibility of a road being constructed through a small portion of Congressionally mandated wilderness.

Even though the news of the Governor's change of mind was discouraging, City and Borough leaders were determined to press on with their efforts. AEB provided the assistance of their Washington, DC lobbyist to assist in the advocacy and legislative progress that would be necessary to make the road a reality. A land exchange was proposed – an offer to transfer 650 acres of King Cove Corporation (KCC) land to the federal government in exchange for a 206 acres road right-of-way through the Izembek Refuge. The lands which KCC were offering to exchange were adjacent the mouth of Kinzarof Lagoon, and commonly referred to as the "bookends." These were lands that Service had previously shown a high priority interest in adding almost all the private ownerships of the King Cove Corporation.

With unanimous support from the Alaska Delegation, King Cove took their case to the 105<sup>th</sup> Congress. The result was the introduction of a land exchange bill entitled the *King Cove Health and Safety Act of 1998*. It directed the Secretary of the Interior to accept the lands offered in trade and modify the Refuge's boundary in order to grant a 60-foot right-of-way for a road. The bill included provisions to ensure that construction and location of the road would be accomplished to minimize the effect on wildlife, and migratory birds in particular. It allowed for the agreement that during periods of high concentrations of birds, all but non-emergency traffic would be prohibited. King Cove agreed to all of those provisions.

Environmental opposition to the bill was fierce and accusations flew about the ulterior motives of the proponents. The land exchange was denounced as inadequate and there were many who expressed alarm over what they saw as a dangerous precedent. Nonetheless, the bill passed the Senate by a 59-38 vote. Interior Secretary Bruce Babbitt said he would recommend that President Bill Clinton veto the bill.

However, with the help of then-Alaska Senator Ted Stevens, Chairman of the influential Senate Appropriations Committee, and White House Chief of Staff, Leon Panetta, a significant compromise was reached to provide \$37.5 million for a combination road and marine link to connect the two communities, or to relocate the King Cove airstrip to a better location, plus a \$2.5 million upgrade to the King Cove clinic.

The compromise was presented to the Mayor of the Aleutians East Borough in a phone call as a take-it or leave-it deal, and he had 30 minutes to decide. The short timeframe was driven by the fact that this legislation was of very high priority to the Alaska Delegation, and Senator Steven's position as Chairman of the Senate Appropriations Committee was sufficiently powerful as to persuade the parties to work something out quickly.

The compromise was accepted. However, it was not until months later that the parties gained a more in-depth understanding of the provisions and nuances contained in the legislation. Partners identified in the legislation, namely the U.S. Dept. of Interior, U.S. Indian Health Service, and Alaska Department of Transportation and Public Facilities, had not been part of the final draft or related negotiations and, as a consequence, had to be educated on the legislation's contents.

Then-Alaska Senator Frank Murkowski was also a major ally in moving the legislation through the Senate. As Chairman of the Senate Energy and Natural Resources Committee, he worked tirelessly to persuade his fellow Senators to support the road. Members of the City of King Cove, King Cove Corporation, Agdaagux Tribe and AEB team watched from the visitor's gallery while the Senate debated their future for 5 hours. After the vote, Senator Murkowski met with the team. He shared both a political premonition and pledge - the premonition was that this legislation was in trouble once it reached the White House; and, the pledge was that he would like to revisit this issue sometime in the future. He was outraged that the interests of people who would never have to experience the perils of travel that King Cove residents experience on a regular basis had managed to thwart King Cove's chances for a road. Both the premonition and the pledge would come true.

Prior to the King Cove Health & Safety bill enactment, DOT/PF released its draft report: "King Cove-Cold Bay Transportation Improvement Assessment: Assessment of Transportation Need." The report rated the road as high importance for the "convenience, reliability, and peace of mind" for the residents of King Cove.

The *King Cove Health and Safety Act* required an EIS to determine the most practicable and feasible alternative for a road and marine link. Prior to the EIS, the legislation required the State of Alaska to determine if a new King Cove airstrip location could minimize safety and weather challenges and improve the viability of air travel in and out of King Cove. The State concluded that there was no reasonable alternative location for an airstrip to serve King Cove.

In 2003, the final King Cove Access Project EIS (KCAP EIS) selected a road and marine link to include hovercraft service from the northeast corner of Cold Bay to a terminal in Cold Bay.

The EIS required consideration of a range of transportation alternatives. One of those alternatives included at the insistence of the AEB, was a road link between King Cove and Cold Bay, which evoked strong reactions during the EIS process. This road link became the line drawn by the Service and the Congress in showing the lands that would be exchanged under the Land Exchange now being examined.

In 2004 when Senator Frank Murkowski became Governor Murkowski. True to his pledge, he approached City of King Cove and the AEB to see if the King Cove team remained interested in getting a land exchange bill through Congress for the construction of a road. Governor Murkowski and the residents of King Cove continued to believe that a road was the most logical, sustainable, and fiscally responsible answer to the community's safety concerns. A small flame of hope was rekindled and plans for a road begin again were in motion.

### 2005 - 2010

To help quantify the community's level of interest in having the city continue its advocacy for a road to Cold Bay, the firm of Cordova Consulting was hired in 2005 to develop, administer, and report on a community survey. Trained surveyors personally visited 130 households (80% of the total households) in King Cove. Ninety- three (93%) percent of the households reaffirmed the road was "very important" to them.

In November 2005, Governor Murkowski met with then-Secretary of Interior, Gale Norton, to discuss this issue. The Governor's first proposal was an offer of over 4,400 acres of State land in Kinzarof Lagoon for 206 acres in the Izembek Refuge for the road corridor. This offer was contained in a March 13, 2006 letter from the Governor to the Secretary. Murkowski wrote: "We have been advised that Rowan Gould has communicated the state's offer, as we discussed it with you, to the director of the United States Fish and Wildlife Service. While Mr. Gould did not make a formal statement recommendation, we understand that he opined that the state's offer of a land exchange is definitely worth considering."

Secretary Norton resigned shortly thereafter. However, Governor Murkowski continued his pursuit of a land exchange with the new Secretary, Dirk Kempthorne. In a June 30, 2006 letter to Secretary Kempthorne, the Governor offered a revised land exchange "involving parts of two townships (41,500 acres) of state land which abuts Izembek National Wildlife Refuge for a 206 acres corridor through refuge lands, including some wilderness." He went on say in this letter, "Previously, the USFWS appeared unwilling to pursue a land exchange. Recent conversations indicate that this position may have changed. It is my understanding that a meeting has been scheduled in mid July to renew the discussions."

Discussions of a land exchange commenced later that year between the national Director of USFWS (Dale Hall), the Alaska USFWS region, and community leaders of King Cove and the Aleutians East Borough. A series of meetings were held in Anchorage, Cold Bay, King Cove, and Washington, DC. These meetings were very direct, yet cordial, discussions

attempting to create a satisfactory land exchange proposal for Mr. Hall to endorse.

The KCC initially agreed to: 1) re-offer the “bookends” 650 acres which were in the *King Cove Health and Safety Act*; 2) increase the bookends and adjacent lands with approximately another 1,650 acres; and, 3) reaffirm their willingness to relinquish about 5,400 acres of their ANCSA land selections in the Izembek Refuge wilderness. Since these discussions took place at Izembek Refuge headquarters in Cold Bay, a fly-over was arranged for Director Hall and AEB Mayor Stanley Mack, to see the proposed lands.

The fly-over allowed Director Hall to view an adjacent 9,000 acres of KCC land, called Mortsensen Lagoon. This land was very attractive to the Director due to its ideal location adjacent the Alaska Peninsula and Izembek Refuges with existing road access from the City of Cold Bay. Also, Director Hall was able to view the excellent road access to Mortsensen Lagoon from the existing road system in Cold Bay and observe the existing road managed by the Service that provided access to Mortsensen Lagoon. The land exchange discussions resumed after the fly-over.

Director Hall took the new position that if the KCC would be willing to include the Mortsensen Lagoon land in their offer, he may be able to take the KCC offer, in conjunction with the existing State offer, to the Secretary of Interior as a viable package in trade for a federal government land right-of-way and possible road link. Mayor Mack told Director Hall that he was not authorized to commit on behalf of the KCC any permissions regarding their Mortsensen Lagoon land, but he agreed to deliver the request for their consideration.

KCC held a special board of directors meeting to discuss this latest proposal from Director Hall. After considerable discussion, KCC agreed to do “whatever it takes” to reach a land exchange agreement with the federal government. The prevailing KCC board attitude was that because this road to the Cold Bay Airport was the Aleut shareholders’ highest priority, they were willing to agree to this final land exchange provision.

Now with a total land exchange offer of 61,000 acres, i.e. 43,000 acres of State land and 18,000 acres of KCC land, the King Cove team moved forward to seek legislation to formalize the offer. Of these 61,000 acres, approximately 45,000 acres of this land, if the bill passed, would become new wilderness lands in the Izembek Refuge. (The DEIS is actually considering the resource values that includes 69,600 acres that are directly involved with the land exchange authorized by the Congress in P.L 111-11, Title VI, Subtitle E.

On June 20, 2007, the Izembek & Alaska Peninsula Refuge & Wilderness Enhancement Act was introduced in the House. Dale Hall, testifying and writing on behalf of USF&WS in support of the proposal, described the lands offered as of “considerable value” to the Service. The offer, if approved by Congress, would represent the first new wilderness lands in Alaska in more than 25 years.

The King Cove team reactivated its advocacy and lobbying support for this new legislation. Numerous personal meetings with the Alaska Delegation and Governor occurred. Many trips to Washington, DC and Juneau took place. Lobbyists on “both sides of the aisle” were engaged to help inform and educate members of Congress. The strategy was to build a bipartisan coalition of support in Congress based on our belief that the merits and magnitude of the revised land exchange offer were a win-win for the federal government and the residents of King Cove. Members of the team personally visited all 535 Congressional offices during this time. Seventy-five of these visits were face-to-face meetings with U.S. Senators and Representatives. Information packets with maps, narrative, and a 6-minute video were provided to each office.

On October 31, 2007 the bill was heard by the House Natural Resources Committee and was successfully passed out of the committee.

Also, during the fall of 2007, the King Cove team secured the support of the National Congress of American Indians and the Alaska Federation of Natives. Personal visits were made by the team to these organizations to educate, advocate, and request their support. Part of our overall legislative strategy was to achieve the support of these two nationally recognized advocates for Native American rights. We believe this was crucial in being able to demonstrate that our particular issue (i.e. decisions about federal land classifications with restrictive use determinations made without our input), at its core, is about fairness and equity for the Aleut residents of King Cove.

Finally, on Sept. 11, 2008 the bill was marked up in the Senate Energy Committee. On March 19, 2009, the *Omnibus Public Land Management Act of 2009*, which included *Subtitle E--Izembek National Wildlife Refuge Land Exchange*, passed the US Senate on a 77-20 vote. A week later, the bill passed the US House of Representatives on a 285-140 vote. President Barack Obama signed it into law on March 30, 2009, on the occasion of the 142<sup>nd</sup> anniversary of the signing of the Alaska Purchase Treaty (the purchase of Alaska from Russia).

The law required compliance with the National Environment Policy Act of 1969 (i.e. an EIS) and provided the Secretary of Interior with the final authority to “. . . determine that the land exchange (including the construction of a road between the City of King Cove , Alaska, and Cold Bay Airport) is in the public interest.”

With the federal legislation signed into law, the King Cove team next turned its attention to the State of Alaska. The State Legislature had to officially approve the land exchange offer of 42,000 acres of state land for the 206-acre road corridor. HB 210, *Izembek State Game Refuge Land Exchange*, was introduced during the first session of the 26<sup>th</sup> Alaska Legislature (March 2009) in the House by Representative Bryce Edgmon (D).

As part of the City of King Cove’s 60<sup>th</sup> year celebration of being a first-class city, held in September 2009, Governor Sean Parnell sent a video commemorating the significance of this

event. He acknowledged the forwarded-thinking attitudes and expectations of the residents of King Cove to incorporate as one of the first, smallest, and most remote cities in what was then still the Territory of Alaska. The highlight of the video was the Governor's direct message to the community that he fully supported the road, and that his administration would aggressively work with the community to make it happen.

### 2010 – Beyond

The Izembek Land Exchange EIS process started in early 2010. The City of King Cove, Agdaagux Tribe of King Cove and Aleutians East Borough were all named in the legislation as "Cooperating Agencies" in this EIS process. All of these organizations have individually entered into a Memorandum of Understanding (MOU) with Service documenting the expectations, responsibilities, and authorities as cooperating agencies. Together, we have a cadre of staff and consultants assisting our efforts that have major EIS credentials covering engineering, environmental, socioeconomic, and cultural disciplines. Many of these team members were involved in the prior KCAP EIS.

Scoping for the EIS started in March and April 2010 with meetings in Anchorage, Washington, DC, and Sand Point, Nelson Lagoon, False Pass, and King Cove. The Izembek Partnership team had representatives at all of these meetings, except False Pass, providing testimony on the importance of the land exchange and desired road connection between King Cove and the Cold Bay Airport.

In April 2010, the Alaska Senate approved HB 210, *Izembek State Game Refuge Land Exchange* with a 40-0 vote. Governor Parnell signed the bill into law on August 19, 2010. In a press release from the bill's sponsor, Bryce Edgmon (D-Dillingham) he said "HB210 passed the House and Senate with a combined unanimous vote of 60 to zero, sending a strong message to the Secretary of Interior that the state of Alaska solidly supports the King Cove-Cold Bay link."

The King Cove team (King Cove Group or KCG) also encouraged the Federal Highway Administration's Western Federal Lands Highway Division (WFLHD) to accept an active role in the EIS as a "Cooperating Agency." WFLHD also signed an MOU with the Service for their participation in the EIS process.

A companion agreement between WFLHD, DOT/PF, AEB, and City of King Cove has been signed to define additional roles for providing EIS data and information on road engineering, location, construction, and operations. This agreement also provides timely and technical support to satisfy the law's requirement for all subsequent and required federal permits within one year of the land exchange, if it is determined by the Secretary to be in the public's best interest.

On December 16, 2010, President Obama convened the second annual Tribal Nations Summit at the White House. The voices of hundreds of tribal members were heard in numerous discussions about improving the health, education and the well being of tribal

nations. Alaska was highlighted as a place where the federal government's trust relationship is falling short of its responsibilities to Alaska Natives. While a proposed summit specific to the unique issues of Alaskan tribes is a great idea, the Agdaagux Tribe's hope is that a direct and far more immediate gesture of that trust relationship is to acknowledge that the Aleut people of King Cove deserve the safety and peace of mind of a road to the Cold Bay Airport.

The City of King Cove, AEB, Agdaagux Tribe, and KCC are optimistic that the draft EIS scheduled to be released in late summer 2011, (actually March 2012) followed by the final EIS in the spring of 2012, and the Record of Decision and Public Interest Finding by summer 2012 will conclude with a finding that the land exchange is in the public's best interest, finalize the land exchange, and thus allow for the construction of the road.

**REVIEW OF IMPACT ASSESSMENTS FOR TERRESTRIAL WILDLIFE  
IN THE IZEMBEK NATIONAL WILDLIFE REFUGE LAND  
EXCHANGE/ROAD CORRIDOR DEIS**

FINAL REPORT

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## INTRODUCTION

The Draft Environmental Impact Statement (DEIS) for the proposed land exchange/road corridor project in the Izembek National Wildlife Refuge (Izembek refuge) was prepared by the U.S. Fish and Wildlife Service (USFWS), the lead federal agency and land manager of the Izembek refuge. The DEIS was publicly released in March 2012 (USFWS 2012a). Under contract to the City of King Cove, ABR has prepared this review of the impact assessments for birds and terrestrial mammals in the DEIS. ABR has not been involved in the DEIS process, and has been asked to provide this third-party review as neither a proponent or opponent of the proposed land exchange/road corridor evaluated in the DEIS.

This report is divided into three sections: (1) General Review Comments, in which general concerns that apply to all or most of the impact assessments for birds and terrestrial mammals are addressed; (2) Quantification of Possible Impacts on Tundra Swans, in which USFWS geospatial data on swan pairs and nests in the Izembek refuge are analyzed to provide a quantitative context for the impact assessment for Tundra Swans prepared in the DEIS; and (3) Appendix A, Specific Review Comments, in which specific responses to portions of the impacts assessments for a particular species or species group are provided.

The land exchange/road corridor DEIS addresses five alternatives: No Action, Southern Road Alternative, Central Road Alternative, Hovercraft from Northeast Hovercraft Terminal, and Lenard Harbor Ferry with Cold Bay Dock Improvements. Because the hovercraft and ferry alternatives do not address the land exchange/road corridor proposal that is the focus of this DEIS, and because the hovercraft and ferry alternatives have been previously evaluated in the earlier King Cove Access Project EIS (USACE 2003), those alternatives are not addressed in this report. The review comments in this report apply only to Alternatives 2 and 3, the Southern Road and Central Road alternatives, respectively, which are proposed to be built across the isthmus between Izembek and Kinzarof lagoons to connect the communities of King Cove and Cold Bay. This review report addresses only Chapter 4 (Environmental Consequences) in the DEIS, and

all comments—except one that refers to the project area map in Chapter 1—apply to Chapter 4.

## GENERAL DEIS REVIEW COMMENTS

### IMPACT ASSESSMENT APPROACH

The impact assessment approach employed in the DEIS follows current convention by using a set of impact criteria or impact components and then deriving summary impact levels (negligible, minor, moderate, major) for each resource by grouping those impact criteria into various combinations. The four impact criteria selected, for all resources, are: intensity (or magnitude), duration, geographic extent, and context, and the specific definitions used for those four impact criteria for biological resources are listed on p. 4-6 (Table 4.1-2). The groupings of those four impact criteria that are used to determine summary impact levels are listed on p. 4-4. However, in the DEIS the groupings of impact criteria are not treated as formal decision-making rules, but rather as guidelines to help in deriving summary impact levels. This approach gives the USFWS the flexibility to apply its judgment in reaching conclusions about the overall level of impact for a particular resource (in this case a particular species or species group). The DEIS states, on page 4-4: “The impact criteria tables use terms and thresholds that are quantified for some components and qualitative for other components. The terms used in the qualitative thresholds are relative, necessarily requiring the analyst to make a judgment about where a particular effect falls in the continuum from negligible to major.” A good example of the flexibility the USFWS has in assigning summary impact levels can be seen in the definition for major impacts in the Summary Impact Levels section on p. 4-4: “Major: Impacts are *generally* [emphasis added] medium or high intensity, long-term or permanent in duration, a regional or extended scope, and affect important or unique resources.” With the term *generally* included in this definition, the USFWS can use its discretion to classify summary impacts as major when the impact criteria indicate that the effects are low intensity and/or local in geographic extent. This is, in fact, what happened in several cases (see Appendix A, Specific Review Comments).

## **NUMBERS OF ANIMALS POTENTIALLY AFFECTED**

The impact assessments in the DEIS for birds and terrestrial mammals do not attempt to estimate the numbers of animals that could be affected by the two proposed road alternatives. Potential effects are described well enough for the species addressed, but without some quantification of the number of animals that could be affected, it is often difficult for the reader to compare potential impacts among alternatives. An effort should be made to determine, at least roughly, how many animals are likely to be affected by the alternatives proposed in the EIS. This is much easier said than done and it may not be possible for some species groups, but some effort should be made in this regard to help interpret the magnitude of potential impacts. Otherwise, in the analysis of effects the USFWS is restricted to using vague terms such as “numerous” and “substantial” without defining what it means by those terms (see Appendix A, Specific Review Comments).

## **MAGNITUDE OF POSSIBLE UNAUTHORIZED ACCESS TO REFUGE LANDS**

In a number of cases in the DEIS, reference is made to the possibility of unauthorized access to refuge lands from the proposed road alternatives, and then summary impact levels for birds and mammals are interpreted in light of an expected increase in effects of disturbance from human activities including increases in hunting pressure. The USFWS correctly notes that some unauthorized access may occur if a road is built across the isthmus between Izembek and Kinzarof lagoons, despite the restrictions that would be in place to prevent it. No attempt is made, however, to determine how common such unauthorized access would be, which leaves any interpretation of impacts that would occur because of unauthorized access without a solid underpinning. One approach to solving this problem would be to investigate the projected increases in human populations in the communities of King Cove and Cold Bay, and to determine how prevalent hunting, for example, is in those communities. Likewise, some assessment of projected levels of visitors to the area in the future, based on historic trends and focusing on

those visitors who hunt, would be helpful. With this information, the USFWS could determine, at least roughly, how likely it is that an increase in human outdoor activities would occur in the region in the foreseeable future. Important questions to be asked in this regard are (1) whether hunting pressure, for example, is expected to increase substantially based on an a projected increase in human presence in the area, or (2) whether hunting pressure might increase less because the populations of residents and visitors are expected to remain relatively stable.

## **SPATIAL SCALE OF IMPACT ASSESSMENTS**

In general, the impact assessments for birds and terrestrial mammals only address those effects that are expected to occur at the local scale of the isthmus between Izembek and Kinzarof lagoons (the single exception to this is the impact assessment prepared for brown bears). To get a complete understanding of how impacts would be manifested for any particular species, however, it is important to evaluate effects also at a broader regional scale to discern how the local-scale impacts would occur within a regional context. Because populations of birds and mammals often occur across broad regions, and because movements of individual animals (e.g., immigration and emigration, annual migrations) also can occur across broad regions over time, it is important to assess impacts at a regional scale in addition to a local scale. To improve the impact assessments for birds and terrestrial mammals in the DEIS, the potential effects should be evaluated at both the local- and regional-scales. For the DEIS, the regional scale could be defined as the project area (see Figure 1-1, p. 1-3 in Chapter 1, Purpose and Need).

## **LAND EXCHANGE CONSIDERED ONLY GENERALLY**

The effects of the proposed land exchange are discussed only in general terms in the DEIS. In all cases (for birds and terrestrial mammals), the land exchange is addressed only briefly in the overall conclusions sections where the summary impacts for wildlife species groups (e.g., birds, threatened and endangered species, large mammals) are

presented. It would be helpful, however, if elements of the land exchange were discussed in more detail along with the predicted impacts for each species and species group addressed. In this way, readers could gain a better understanding of how the impacts of the proposed road alternatives would occur within the broader context of all potential refuge lands that could come under USFWS management through the proposed action. The land exchange, of course, will not alter any of the impact assessments (the land exchange cannot reduce impacts), but the predicted impacts in the local isthmus area between Izembek and Kinzarof lagoons need to be understood in the complete context of the proposed action. For example, when discussing the impacts of disturbance on Tundra Swans within a disturbance-buffer area surrounding the proposed road alignment for Alternative 2 or 3, the quality of the additional habitats involved in the land exchange to support nesting Tundra Swans should be noted. No new habitat will be created to compensate for any impacts in the isthmus area, but additional land would be added to the refuge system and would receive increased protection from development. In the example here, it is important to understand the habitat value of those additional lands for nesting Tundra Swans when considering the impacts on swans in the isthmus area (see Quantification of Possible Impacts on Tundra Swans below).

### **IMPACT ASSESSMENTS SHOULD INCORPORATE MITIGATION**

The effects on birds and mammals have not been assessed consistently in all cases in the DEIS because the impacts were often categorized to levels (major, moderate, minor, negligible) *without* taking into account the mitigation measures proposed for each alternative. There are two concerns here. The first, and most important, is that it would be more accurate to assess the overall impacts of each alternative on birds and mammals *after* taking into account the proposed mitigation measures. The goal would be to assess what are often referred to as “residual impacts” (i.e., those that would occur after mitigation). Granted there is discussion in the Mitigation Measures sections for each resource about how the proposed mitigation measures would reduce the level of expected

impacts, but the overall conclusions on impacts list the impact levels that were assessed without mitigation. This represents a misleading picture of what the actual impacts are likely to be for each alternative and should be corrected. In the impact assessments for threatened and endangered bird species, however, the USFWS does, in fact, address mitigation measures before reaching conclusions about the overall impact levels; these impact assessments represent exceptions to the general pattern described here and should be applied to the other species addressed in the DEIS.

The second problem is that, in some cases, it appears there has been a classification problem with respect to which features are treated as part of a proposed action and which features are treated as mitigation measures. For example, one of the prominent “mitigation” measures (bollard or cable barriers along the proposed roads for Alternatives 2 and 3) is actually a fundamental design feature of the proposed road alternatives (the access barriers will be required by law). This particular feature would be more accurately treated as part of the proposed actions for Alternatives 2 and 3, not as a mitigation measure.

### **QUANTIFICATION OF POSSIBLE IMPACTS ON TUNDRA SWANS**

In an attempt to quantify the possible impacts to breeding Tundra Swans from construction and use of the Southern and Central Road alignments proposed in the DEIS, ABR conducted GIS analyses of USFWS data depicting the locations of Tundra Swan pairs and nests in the Izembek refuge (USFWS 2012b). The analyses were conducted to (1) provide information on the estimated numbers of swan breeding pairs (pairs and nests combined) that potentially could be disturbed by construction and use of the Southern and Central Road alignments, (2) provide both local- and regional-scale contexts for those possible disturbance effects, and (3) enumerate the breeding Tundra Swans occurring on lands that would be exchanged under the proposed action in the DEIS.

Following the recommendations in ABR (2010), two disturbance buffers (800 m and 1,500 m on either side of the centerline of the road alignments) were used to derive estimates of the number of breeding pairs that could potentially be

disturbed from activities associated with the proposed road. Swans occurring within the 800-m (0.50 mi) buffer would be more likely to be displaced by disturbance from road traffic and unauthorized access by humans approaching from the proposed road than swans occurring within the 1,500-m (0.93 mi) buffer.

Alternative 2 – Southern Road Alignment.

Considering the Southern Road Alignment first and using data from USFWS swan spring nesting surveys (1978–2002) and swan breeding-pair population surveys (2004–2005), it was found that the number of observed breeding pairs within the 1,500-m buffer of the Southern Road Alignment ranged from 0 to 6, depending on the year (Table 1). These numbers represent between 0 to 16% of the total number of observed swan breeding pairs recorded in the Izembek refuge for the years 1978 to 2005. The other point to note from these data is that the numbers of observed swan breeding pairs occurring within the 1,500-m buffer of the possible road alignment were rather variable among years. This suggests—because swans show strong fidelity to nest sites across years—that some pairs observed during the survey years with higher numbers of breeding pairs may not actually have been nesting in the area.

Using all 26 years in the USFWS data set and projecting forward, these data indicate that an average of 2.1 observed breeding pairs could occur within the 1,500-m buffer of the Southern Road Alignment in a given year (Table 1). Applying the USFWS method to derive the estimated number of breeding pairs,\* these data indicate that an average of 2.5 estimated breeding pairs could occur within the 1,500-m buffer. These birds could experience some disturbance and possible displacement because of activities associated with the proposed road at the local scale of the isthmus between Izembek and Kinzarof lagoons. In this example, the local-scale effects could extend as far as 1,500 m on either side of the proposed road (Figure 1). At a broader, regional scale (the boundary of the Izembek refuge was used as the regional scale), the mean of 2.1 observed breeding pairs represents, on average, 5.7% of the total annual average number of observed swan breeding pairs (34.6) recorded in

the Izembek refuge during the survey years (Table 1). For estimated breeding pairs, the mean of 2.5 breeding pairs within the 1,500-m buffer represents 6.1% of the total annual average number of estimated swan breeding pairs (38.2) recorded in the Izembek refuge.

For the 800-m buffer surrounding the Southern Road Alignment, the number of observed breeding pairs ranged from 0 to 3, depending on the year (Table 2). These numbers represent between 0 to 8% of the total number of observed swan pairs and nests recorded in the Izembek refuge for the years 1978 to 2005. Across all survey years, these data indicate that an average of 0.7 observed breeding pairs (or 0.9 estimated breeding pairs) could occur within the 800-m buffer of the Southern Road Alignment in a given year (Table 2). These birds could experience some disturbance and possible displacement because of activities associated with the proposed road at the local scale of the isthmus between Izembek and Kinzarof lagoons, and the effects could extend as far as 800 m on either side of the proposed road (Figure 1). At the regional scale of the Izembek refuge, the mean of 0.7 observed breeding pairs represents, on average, 2.0% of the total annual average number of observed swan breeding pairs (34.6) recorded in the Izembek refuge during the 26 survey years (Table 2). For estimated breeding pairs, the mean of 0.9 breeding pairs within the 800-m buffer represents 2.2% of the total annual average number of estimated swan breeding pairs (38.2) recorded in the Izembek refuge. The spatial distribution of swan breeding pairs and nests recorded throughout the Izembek refuge, including the areas on the isthmus in which breeding pairs could be displaced (within the 1,500-m buffer and the smaller 800-m buffer) is illustrated in Figure 2.

Alternative 3 – Central Road Alignment.

Considering the Central Road Alignment, it was found that the number of observed breeding pairs within the 1,500-m buffer of the road alignment ranged from 0 to 7, depending on the year (Table 3). These numbers represent between 0 to 18% of the total number of observed swan pairs recorded in the Izembek refuge for the years 1978 to 2005. As was the case with the Southern Road

\* The estimated number of breeding pairs is used to correct for those observations of single birds that could be associated with an unobserved nest or for which the other bird in the pair was not observed; in the method, observed pairs and nests = 1, single birds with nests = 1 (counted as a pair), and single birds without a nest = 1/2.

Table 1. Number of Tundra Swan breeding pairs (pairs and nests combined) occurring within a 1,500-m buffer on either side of the Southern Road Alignment proposed in Alternative 2 in the DEIS, compared to the total number of breeding pairs in Izembek NWR.<sup>a</sup>

Survey Year	Observed Pairs in Buffer	Total Observed Pairs in NWR	% of Total Observed in NWR	Estimated Pairs in Buffer <sup>b</sup>	Total Estimated Pairs in NWR <sup>b</sup>	% of Total Estimated in NWR
1978	0	18	0.0	0	20.5	0.0
1979	5	44	11.4	5	47.5	10.5
1980	1	55	1.8	2	58.5	3.4
1981	6	55	10.9	6	60	10.0
1982	2	57	3.5	3.5	61.5	5.7
1983	3	53	5.7	3.5	55.5	6.3
1984	2	50	4.0	3	52	5.8
1985	1	38	2.6	1	44	2.3
1986	2	49	4.1	2.5	52.5	4.8
1987	4	46	8.7	5	48.5	10.3
1988	2	25	8.0	2	27	7.4
1989	1	32	3.1	1.5	34	4.4
1990	1	26	3.8	2	30	6.7
1991	3	34	8.8	3	35.5	8.5
1992	4	28	14.3	4.5	32.5	13.8
1993	4	38	10.5	4	40	10.0
1994	2	34	5.9	2	39	5.1
1995	6	37	16.2	6	39.5	15.2
1996	1	35	2.9	1.5	36	4.2
1998	1	20	5.0	1.5	28	5.4
1999	1	29	3.4	1.5	34.5	4.3
2000	1	17	5.9	1.5	21	7.1
2001	0	10	0.0	0	13.5	0.0
2002	0	21	0.0	0	21.5	0.0
2004	0	20	0.0	0	24.5	0.0
2005	2	29	6.9	2.5	35.5	7.0
Average	2.1	34.6	5.7	2.5	38.2	6.1

<sup>a</sup> Source: USFWS geospatial data for swan spring nesting surveys (1978–2002) and swan population surveys (2004–2005) conducted in the Izembek NWR (USFWS 2012).

<sup>b</sup> USFWS method used to calculate estimated breeding pairs: observed pairs and nests = 1; singles with no nests = ½.

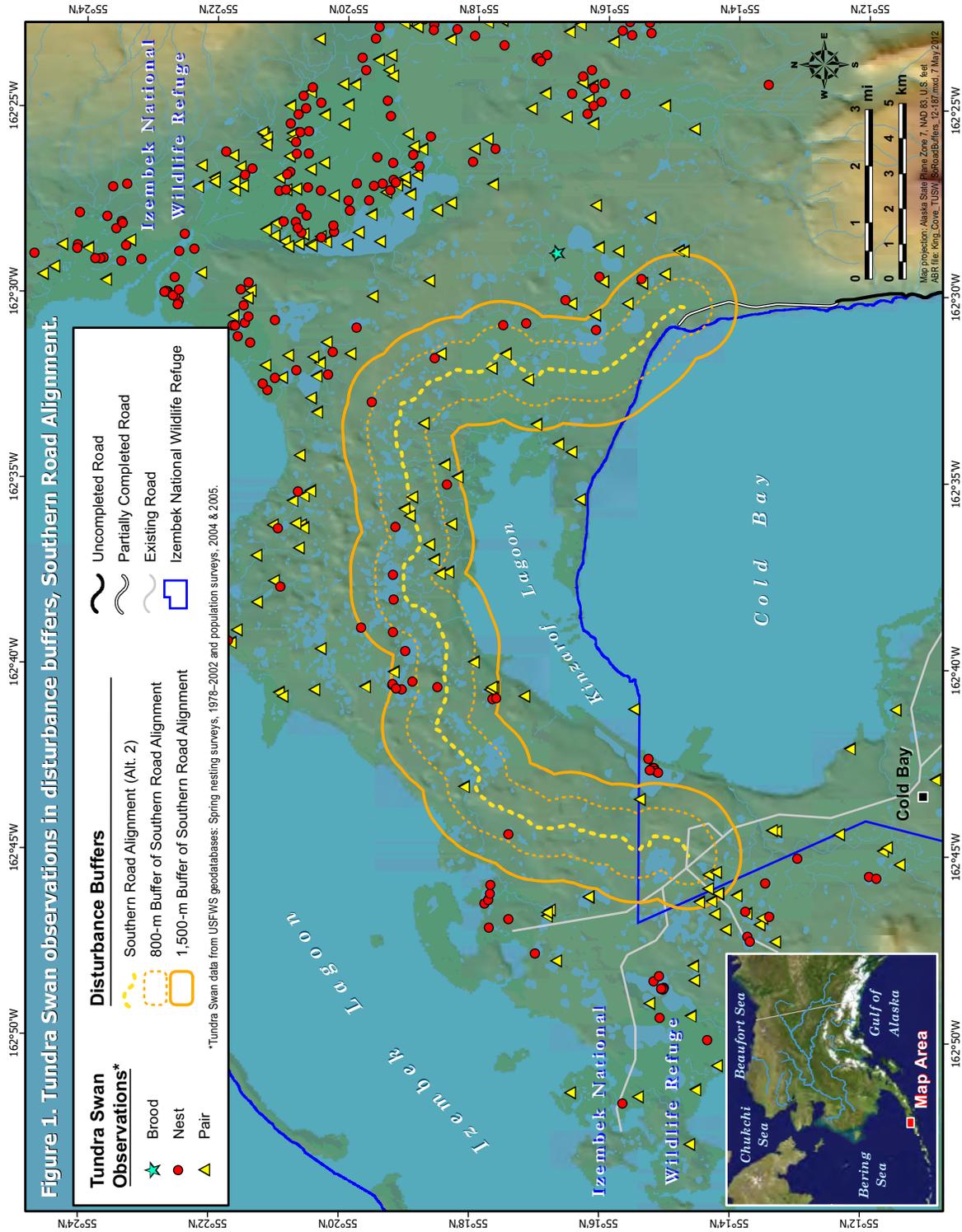


Figure 1. Tundra Swan observations in disturbance buffers, Southern Road Alignment.

Table 2. Number of Tundra Swan breeding pairs (pairs and nests combined) occurring within a 800-m buffer on either side of the Southern Road Alignment proposed in Alternative 2 in the DEIS, compared to the total number of breeding pairs in Izembek NWR.<sup>a</sup>

Survey Year	Observed Pairs in Buffer	Total Observed Pairs in NWR	% of Total Observed in NWR	Estimated Pairs in Buffer <sup>b</sup>	Total Estimated Pairs in NWR <sup>b</sup>	% of Total Estimated in NWR
1978	0	18	0.0	0	20.5	0.0
1979	0	44	0.0	0	47.5	0.0
1980	0	55	0.0	0	58.5	0.0
1981	2	55	3.6	2	60	3.3
1982	0	57	0.0	1	61.5	1.6
1983	1	53	1.9	1	55.5	1.8
1984	1	50	2.0	1	52	1.9
1985	1	38	2.6	1	44	2.3
1986	1	49	2.0	1.5	52.5	2.9
1987	2	46	4.3	2.5	48.5	5.2
1988	1	25	4.0	1	27	3.7
1989	0	32	0.0	0.5	34	1.5
1990	1	26	3.8	2	30	6.7
1991	0	34	0.0	0	35.5	0.0
1992	1	28	3.6	1.5	32.5	4.6
1993	3	38	7.9	3	40	7.5
1994	1	34	2.9	1	39	2.6
1995	2	37	5.4	2	39.5	5.1
1996	0	35	0.0	0	36	0.0
1998	1	20	5.0	1	28	3.6
1999	0	29	0.0	0	34.5	0.0
2000	0	17	0.0	0	21	0.0
2001	0	10	0.0	0	13.5	0.0
2002	0	21	0.0	0	21.5	0.0
2004	0	20	0.0	0	24.5	0.0
2005	1	29	3.4	1.5	35.5	4.2
Average	0.7	34.6	2.0	0.9	38.2	2.2

<sup>a</sup> Source: USFWS geospatial data for swan spring nesting surveys (1978–2002) and swan population surveys (2004–2005) conducted in the Izembek NWR (USFWS 2012).

<sup>b</sup> USFWS method used to calculate estimated breeding pairs: observed pairs and nests = 1; singles with no nests = ½.

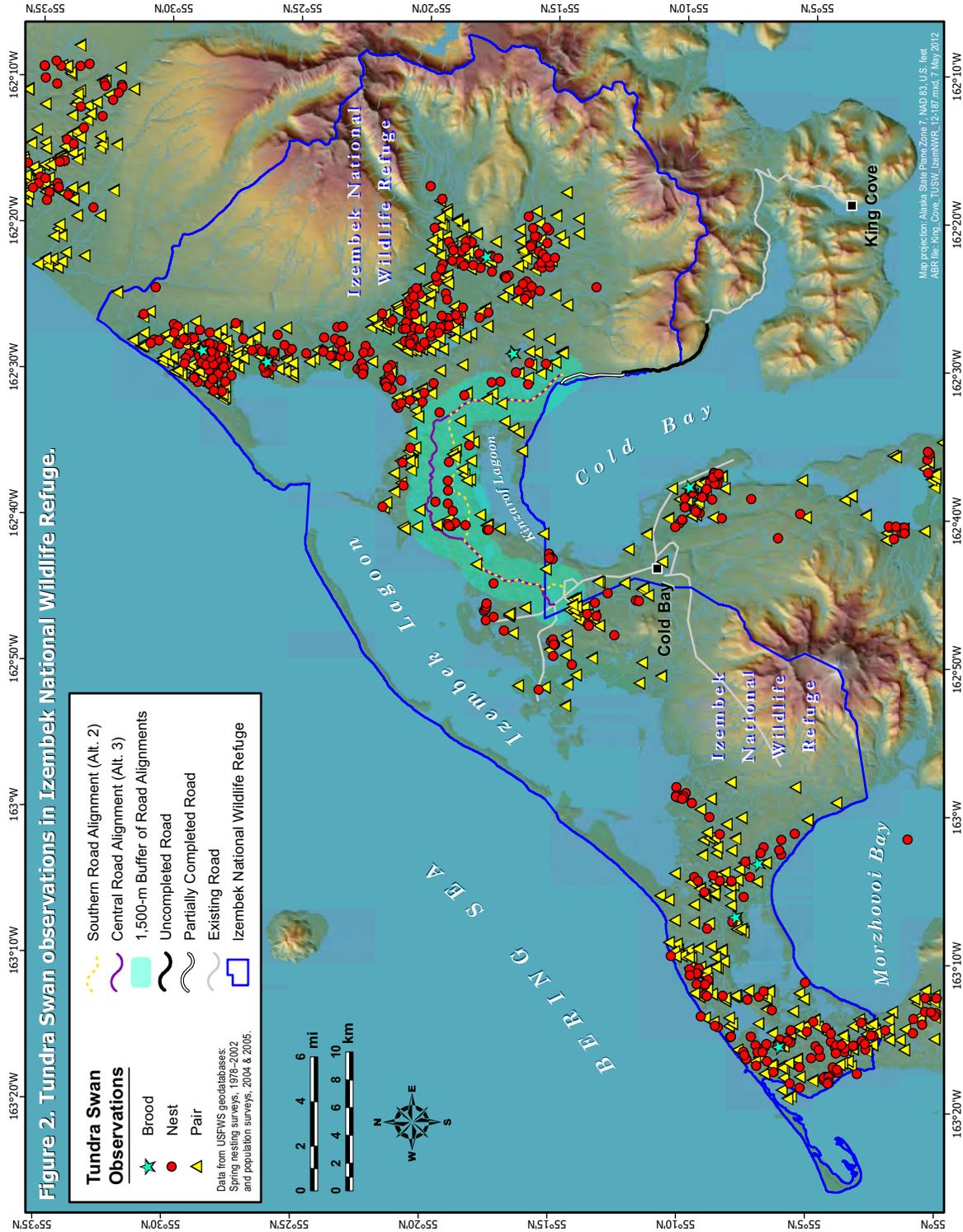


Figure 2. Tundra Swan observations in Izembek National Wildlife Refuge.

Table 3. Number of Tundra Swan breeding pairs (pairs and nests combined) occurring within a 1,500-m buffer on either side of the Central Road Alignment proposed in Alternative 3 in the DEIS, compared to the total number of breeding pairs in Izembek NWR.<sup>a</sup>

Survey Year	Observed Pairs in Buffer	Total Observed Pairs in NWR	% of Total Observed in NWR	Estimated Pairs in Buffer <sup>b</sup>	Total Estimated Pairs in NWR <sup>b</sup>	% of Total Estimated in NWR
1978	0	18	0.0	0	20.5	0.0
1979	1	44	2.3	1	47.5	2.1
1980	2	55	3.6	2	58.5	3.4
1981	7	55	12.7	7	60	11.7
1982	2	57	3.5	2.5	61.5	4.1
1983	2	53	3.8	2	55.5	3.6
1984	0	50	0.0	0.5	52	1.0
1985	2	38	5.3	3	44	6.8
1986	1	49	2.0	1	52.5	1.9
1987	3	46	6.5	3	48.5	6.2
1988	2	25	8.0	2	27	7.4
1989	0	32	0.0	0	34	0.0
1990	2	26	7.7	2.5	30	8.3
1991	3	34	8.8	3	35.5	8.5
1992	5	28	17.9	5	32.5	15.4
1993	4	38	10.5	4	40	10.0
1994	3	34	8.8	3	39	7.7
1995	3	37	8.1	3	39.5	7.6
1996	1	35	2.9	1	36	2.8
1998	1	20	5.0	1.5	28	5.4
1999	1	29	3.4	1.5	34.5	4.3
2000	1	17	5.9	1	21	4.8
2001	0	10	0.0	0	13.5	0.0
2002	0	21	0.0	0	21.5	0.0
2004	1	20	5.0	1	24.5	4.1
2005	2	29	6.9	2	35.5	5.6
Average	1.9	34.6	5.3	2.0	38.2	5.1

<sup>a</sup> Source: USFWS geospatial data for swan spring nesting surveys (1978–2002) and swan population surveys (2004–2005) conducted in the Izembek NWR (USFWS 2012).

<sup>b</sup> USFWS method used to calculate estimated breeding pairs: observed pairs and nests = 1; singles with no nests = ½.

Alignment, the numbers of observed swan breeding pairs occurring within the 1,500-m buffer of the Central Road Alignment were variable among years. This suggests—because swans show strong fidelity to nest sites across years—that some pairs observed during the survey years with higher numbers of breeding pairs may not actually have been nesting in the area.

Using all 26 years in the USFWS data set, these data indicate that an average of 1.9 observed breeding pairs (or 2.0 estimated breeding pairs) could occur within the 1,500-m buffer of the Central Road Alignment in a given year (Table 3). These birds could experience some disturbance and possible displacement because of activities associated with the proposed road at the local scale of the isthmus between Izembek and Kinzarof lagoons, and the effects could extend as far as 1,500 m on either side of the proposed road (Figure 3). At the regional scale of the Izembek refuge, the mean of 1.9 observed breeding pairs represents, on average, 5.3% of the total annual average number of observed swan breeding pairs (34.6) recorded in the Izembek refuge during the survey years (Table 3). For estimated breeding pairs, the mean of 2.0 breeding pairs within the 1,500-m buffer represents 5.1% of the total annual average number of estimated swan breeding pairs (38.2) recorded in the Izembek refuge.

For the 800-m buffer surrounding the Central Road Alignment, the number of observed breeding pairs ranged from 0 to 2, depending on the year (Table 4). These numbers represent between 0 to 7% of the total number of observed swan breeding pairs recorded in the Izembek refuge for the years 1978 to 2005. Across all survey years, these data indicate that an average of 0.6 observed breeding pairs (or 0.7 estimated breeding pairs) could occur within the 800-m buffer of the Central Road Alignment in a given year (Table 4). These birds could experience some disturbance and possible displacement because of activities associated with the proposed road at the local scale of the isthmus between Izembek and Kinzarof lagoons, and the effects could extend as far as 800 m on either side of the proposed road (Figure 3). At the regional scale of the Izembek refuge, the mean of 0.6 observed breeding pairs represents, on average, 1.7% of the total annual average number of observed swan breeding pairs (34.6) recorded in

the Izembek refuge during the 26 survey years (Table 4). For estimated breeding pairs, the mean of 0.7 breeding pairs within the 800-m buffer similarly represents 1.7% of the total annual average number of estimated swan breeding pairs (38.2) recorded in the Izembek refuge. The spatial distribution of swan breeding pairs and nests recorded throughout the Izembek refuge, including the areas on the isthmus in which breeding pairs could be displaced (within the 1,500-m buffer and the smaller 800-m buffer) is illustrated in Figure 2.

Use of Land Exchange Parcels by Breeding Swans. The proposed action in the DEIS involves the transfer of three categories of land parcels to the U.S. government to be managed by the USFWS: (1) King Cove Corporation lands to be conveyed to the U.S., (2) King Cove Corporation ANCSA-selected lands to be relinquished to the U.S., and (3) State of Alaska lands to be transferred to the U.S. These three land parcel types occur in five general locations within the project area (Figure 4). To evaluate the use of the land parcels in those five areas by breeding Tundra Swans, ABR analyzed USFWS data depicting the locations of Tundra Swan pairs and nests in the Izembek refuge and surrounding areas (USFWS 2012b). In the King Cove Corporation lands at the mouth of Kinzarof Lagoon, rather few swan breeding pairs were observed during the 26 survey years represented in the USFWS data set; an annual average of 0.1 observed breeding pairs and 0.1 estimated breeding pairs was recorded across all years (Tables 5 and 6). Similarly, few swans were found breeding in the King Cove Corporation ANCSA-selected lands (an annual average of 0.5 observed breeding pairs or 0.6 estimated breeding pairs was recorded across all years). More swans are found in the King Cove Corporation lands at Mortensens Lagoon, with an annual average of 1.9 observed breeding pairs or 2.1 estimated breeding pairs recorded across all survey years. Of the five land parcels examined, the northern parcel of State of Alaska lands to the northeast of the Izembek refuge supports the greatest number of breeding swans (an annual average of 3.4 observed breeding pairs or 3.8 estimated breeding pairs was recorded across all years). The southern parcel of State of Alaska lands, on the other hand, supports few breeding swans, with an annual average of 0.1 observed breeding pairs and 0.1 estimated breeding

Table 3. Number of Tundra Swan breeding pairs (pairs and nests combined) occurring within a 1,500-m buffer on either side of the Central Road Alignment proposed in Alternative 3 in the DEIS, compared to the total number of breeding pairs in Izembek NWR.<sup>a</sup>

Survey Year	Observed Pairs in Buffer	Total Observed Pairs in NWR	% of Total Observed in NWR	Estimated Pairs in Buffer <sup>b</sup>	Total Estimated Pairs in NWR <sup>b</sup>	% of Total Estimated in NWR
1978	0	18	0.0	0	20.5	0.0
1979	1	44	2.3	1	47.5	2.1
1980	2	55	3.6	2	58.5	3.4
1981	7	55	12.7	7	60	11.7
1982	2	57	3.5	2.5	61.5	4.1
1983	2	53	3.8	2	55.5	3.6
1984	0	50	0.0	0.5	52	1.0
1985	2	38	5.3	3	44	6.8
1986	1	49	2.0	1	52.5	1.9
1987	3	46	6.5	3	48.5	6.2
1988	2	25	8.0	2	27	7.4
1989	0	32	0.0	0	34	0.0
1990	2	26	7.7	2.5	30	8.3
1991	3	34	8.8	3	35.5	8.5
1992	5	28	17.9	5	32.5	15.4
1993	4	38	10.5	4	40	10.0
1994	3	34	8.8	3	39	7.7
1995	3	37	8.1	3	39.5	7.6
1996	1	35	2.9	1	36	2.8
1998	1	20	5.0	1.5	28	5.4
1999	1	29	3.4	1.5	34.5	4.3
2000	1	17	5.9	1	21	4.8
2001	0	10	0.0	0	13.5	0.0
2002	0	21	0.0	0	21.5	0.0
2004	1	20	5.0	1	24.5	4.1
2005	2	29	6.9	2	35.5	5.6
Average	1.9	34.6	5.3	2.0	38.2	5.1

<sup>a</sup> Source: USFWS geospatial data for swan spring nesting surveys (1978–2002) and swan population surveys (2004–2005) conducted in the Izembek NWR (USFWS 2012).

<sup>b</sup> USFWS method used to calculate estimated breeding pairs: observed pairs and nests = 1; singles with no nests = ½.

Table 4. Number of Tundra Swan breeding pairs (pairs and nests combined) occurring within a 800-m buffer on either side of the Central Road Alignment proposed in Alternative 3 in the DEIS, compared to the total number of breeding pairs in Izembek NWR.<sup>a</sup>

Survey Year	Observed Pairs in Buffer	Total Observed Pairs in NWR	% of Total Observed in NWR	Estimated Pairs in Buffer <sup>b</sup>	Total Estimated Pairs in NWR <sup>b</sup>	% of Total Estimated in NWR
1978	0	18	0.0	0	20.5	0.0
1979	0	44	0.0	0	47.5	0.0
1980	1	55	1.8	1	58.5	1.7
1981	2	55	3.6	2	60	3.3
1982	1	57	1.8	1.5	61.5	2.4
1983	1	53	1.9	1	55.5	1.8
1984	0	50	0.0	0	52	0.0
1985	0	38	0.0	0.5	44	1.1
1986	0	49	0.0	0	52.5	0.0
1987	2	46	4.3	2	48.5	4.1
1988	1	25	4.0	1	27	3.7
1989	0	32	0.0	0	34	0.0
1990	1	26	3.8	1.5	30	5.0
1991	1	34	2.9	1	35.5	2.8
1992	2	28	7.1	2	32.5	6.2
1993	1	38	2.6	1	40	2.5
1994	1	34	2.9	1	39	2.6
1995	0	37	0.0	0	39.5	0.0
1996	0	35	0.0	0	36	0.0
1998	0	20	0.0	0	28	0.0
1999	0	29	0.0	0	34.5	0.0
2000	0	17	0.0	0	21	0.0
2001	0	10	0.0	0	13.5	0.0
2002	0	21	0.0	0	21.5	0.0
2004	0	20	0.0	0	24.5	0.0
2005	2	29	6.9	2	35.5	5.6
Average	0.6	34.6	1.7	0.7	38.2	1.7

<sup>a</sup> Source: USFWS geospatial data for swan spring nesting surveys (1978–2002) and swan population surveys (2004–2005) conducted in the Izembek NWR (USFWS 2012).

<sup>b</sup> USFWS method used to calculate estimated breeding pairs: observed pairs and nests = 1; singles with no nests = ½.

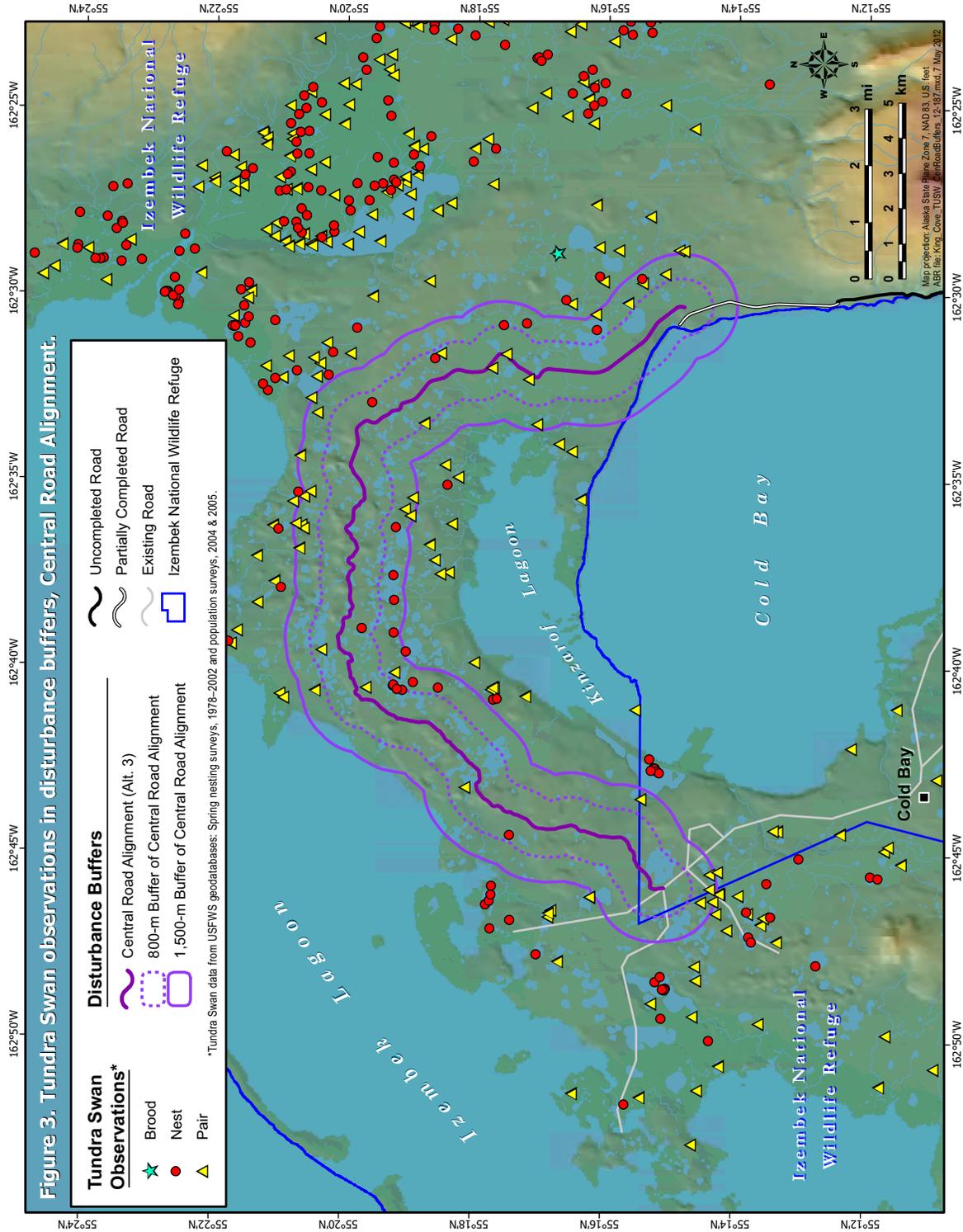


Figure 3. Tundra Swan observations in disturbance buffers, Central Road Alignment.

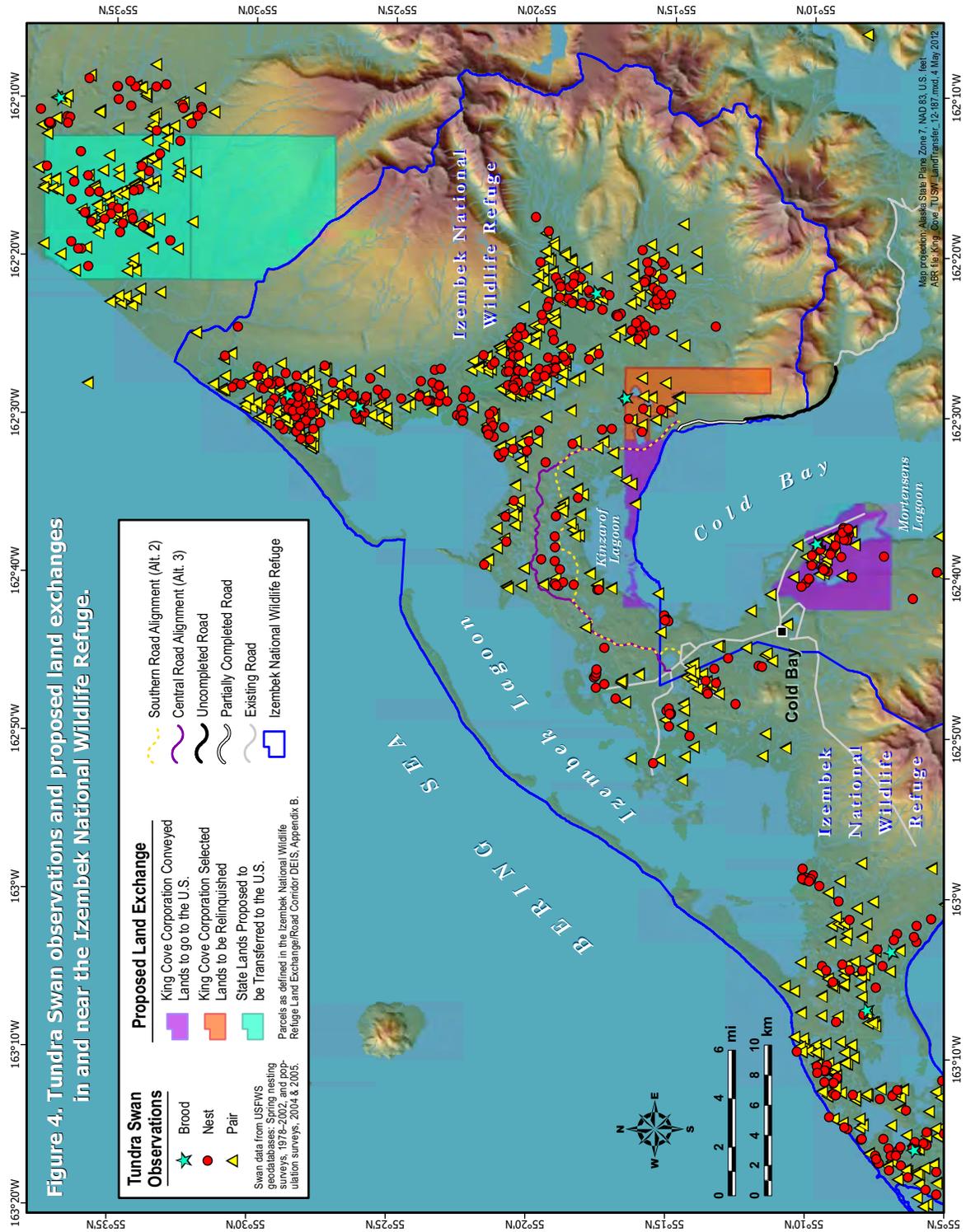


Figure 4. Tundra Swan observations and proposed land exchanges in and near the Izembek National Wildlife Refuge.

Table 5. Observed number of Tundra Swan breeding pairs (pairs and nests combined) occurring on land parcels to be transferred to the U.S. as part of the proposed action in the DEIS.<sup>a</sup>

Survey Year	KCC Lands: Kinzarof Lagoon <sup>b</sup>	KCC Lands: Mortensens Lagoon <sup>c</sup>	KCC Selected Lands <sup>d</sup>	State Lands: Northern Block <sup>e</sup>	State Lands: Southern Block <sup>f</sup>
1978	0	3	0	0	0
1979	0	4	0	4	0
1980	0	5	0	5	0
1981	0	9	0	6	0
1982	1	3	1	7	0
1983	0	4	1	4	0
1984	0	2	1	5	0
1985	0	1	0	3	0
1986	0	2	3	4	0
1987	0	2	1	4	0
1988	0	1	1	3	0
1989	0	1	1	4	0
1990	0	1	0	4	0
1991	0	0	0	1	0
1992	0	0	1	5	0
1993	0	0	1	4	2
1994	0	2	1	4	0
1995	0	1	0	4	0
1996	0	2	0	1	0
1998	1	1	0	3	0
1999	1	1	1	4	0
2000	0	0	0	1	0
2001	0	1	0	4	0
2002	0	1	0	1	0
2004	0	1	0	3	0
2005	0	2	0	0	0
Average	0.1	1.9	0.5	3.4	0.1

<sup>a</sup> Source: USFWS geospatial data for swan spring nesting surveys (1978–2002) and swan population surveys (2004–2005) conducted in the Izembek NWR and surrounding areas (USFWS 2012).

<sup>b</sup> King Cove Corporation lands on either side of the mouth of Kinzarof Lagoon.

<sup>c</sup> King Cove Corporation lands in the Mortensens Lagoon area.

<sup>d</sup> King Cove Corporation ANCSA-selected lands located to the southeast of Kinzarof Lagoon.

<sup>e</sup> State of Alaska lands to the northeast of Izembek NWR (northern block).

<sup>f</sup> State of Alaska lands to the northeast of Izembek NWR (southern block).

Table 6. Estimated number of Tundra Swan breeding pairs (pairs and nests combined) occurring on land parcels to be transferred to the U.S. as part of the proposed action in the DEIS.<sup>a</sup>

Survey Year	KCC Lands: Kinzarof Lagoon <sup>b</sup>	KCC Lands: Mortensens Lagoon <sup>c</sup>	KCC Selected Lands <sup>d</sup>	State Lands: Northern Parcel <sup>e</sup>	State Lands: Southern Parcel <sup>f</sup>
1978	0	3	0	0	0
1979	0	4.5	0	4	0
1980	0	5	0	5	0
1981	0	9	0	6	0
1982	1	3	1.5	7	0
1983	0	4.5	1	4	0
1984	0	2	1	5.5	0
1985	0	1.5	0	4	0
1986	0	2	3	4	0
1987	0	2	1	4	0
1988	0	1	1	3.5	0
1989	0	1	1	4	0
1990	0	1	0	4.5	0
1991	0	0	0	1.5	0
1992	0	0	1	6	0
1993	0	0.5	1.5	4.5	2
1994	0	2	1	4	0.5
1995	0	1	0	4	0
1996	0	2	0	1	0
1998	1.5	1	0	6	0
1999	1	1.5	1	4.5	0
2000	0	1	0	2.5	0
2001	0	1	0	4.5	0
2002	0	1	0	1.5	0
2004	0	1	0	4	0
2005	0	2.5	0.5	0	0
Average	0.1	2.1	0.6	3.8	0.1

<sup>a</sup> Source: USFWS geospatial data for swan spring nesting surveys (1978–2002) and swan population surveys (2004–2005) conducted in the Izembek NWR and surrounding areas (USFWS 2012). USFWS method used to calculate estimated breeding pairs: observed pairs and nests = 1; singles with no nests = ½.

<sup>b</sup> King Cove Corporation lands on either side of the mouth of Kinzarof Lagoon.

<sup>c</sup> King Cove Corporation lands in the Mortensens Lagoon area.

<sup>d</sup> King Cove Corporation ANCSA-selected lands located to the southeast of Kinzarof Lagoon.

<sup>e</sup> State of Alaska lands to the northeast of Izembek NWR (northern block).

<sup>f</sup> State of Alaska lands to the northeast of Izembek NWR (southern block).

pairs recorded across all survey years. The spatial distribution of Tundra Swan breeding pairs and nests recorded in each of the five land parcels evaluated is illustrated in Figure 4.

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### **IMPACT ASSESSMENT APPROACH**

Comment 1: Chapter 4 – Summary Impact Levels section, p. 4-4, second paragraph. In the definition for negligible summary impacts, the DEIS states: “*Impacts are generally extremely low in intensity (often they cannot be measured or observed), are temporary, localized, and do not affect unique resources.*” And then in the definition for major summary impacts, the DEIS states: “*Impacts are generally medium or high intensity, long-term or permanent in duration, a regional or extended scope, and affect important or unique resources.*” Response: These definitions appear to include some of the findings of the impact assessments, when they state that negligible impacts do not affect unique resources and that major impacts affect important and unique resources. This is not entirely clear, however, and another interpretation is that the definitions have been developed so that—using the definition for major impacts as an example—common resources could never be categorized as being affected by major impacts in the DEIS. These impact-level definitions could be more clearly stated to reflect how the impact criteria were used to make summary impact-level determinations.

Comment 2: Chapter 4 – Impact Criteria for Biological Resources section, p. 4-6, Table 4.1-2. For biological resources, only two categories of effect are listed in this table: behavioral disturbance and habitat alterations. It would be more accurate to include also a specific assessment for habitat loss (habitat loss currently is treated under the category of habitat alteration, which is not strictly correct). Additionally, the impact analyses frequently discuss injury and mortality, especially from collisions with vehicles and increased hunter access, but there is no effect category of effect for injury or mortality. This oversight becomes obvious (see additional comments below) in several cases in which there is no quantification or categorization of the magnitude of the increased mortality predicted to occur from construction and use of the proposed road. For a complete understanding of the impacts expected from the proposed land exchange/road corridor, the impact criteria should be defined for habitat loss and injury/mortality also, in addition to behavioral disturbance and habitat alteration.

Comment 3: Chapter 4 – Impact Criteria for Biological Resources section, p. 4-6, Table 4.1-2. In this table, when defining impact intensity levels for the habitat alteration impact criterion, it is not obvious what is meant by “changes in resource character.” A more focused definition of habitat alteration effects,

based on the expected changes in habitats due to road construction and operations would be more informative.

Comment 4: Chapter 4 – Impact Criteria for Biological Resources section, p. 4-6, Table 4.1-2. In this table it is not clear what separates medium and high intensity effects for behavioral disturbance. For example, it is not obvious how “acute or obvious/abrupt change in behavior” (high intensity) differs from “noticeable change in behavior” (medium intensity). Similarly, it is not clear how “animals depart from the EIS project area” (high intensity) differs from “animals move away from the EIS project area” (medium intensity). More explanation would be helpful here to help inform the reader. It is also not entirely clear what separates medium and high intensity effects for habitat alterations. For example, it is not obvious how “acute or obvious changes in resource character” (high intensity) differ from “noticeable changes in resource character” (medium intensity). Again, more explanation would be helpful in this case as well to describe the differences in the types of changes envisioned in the two intensity categories.

Comment 5: Chapter 4 – Impact Criteria for Biological Resources section, p. 4-6, Table 4.1-2. This table does not list the number of animals that could potentially be affected by behavioral disturbance as an element to use in evaluating the intensity of the expected impacts. The number of animals to be affected, and the number or proportion affected in relation to the size of the local and regional breeding populations, for example, are critical to an impact assessment. Quantification of animal numbers often can be difficult when data are limited, but an attempt should be made in the EIS to estimate the number of animals, especially for important and unique species, that could be affected by the proposed land exchange/road corridor.

## **IMPACT ASSESSMENTS FOR BIRDS – ALTERNATIVE 2**

Comment 6: Chapter 4 – Alternative 2 – Birds – General Impacts section, p. 4-135, last paragraph. The DEIS states: “*Given the likelihood that people will use the road to access Kinzarof Lagoon with all-terrain vehicles and by foot, this ½ [mile] buffer zone is unlikely to be realized in different locations of [Kinzarof] lagoon, leading to substantial increases in disturbance and subsistence harvest of waterfowl and other species in the area. The intensity of these indirect effects could be much larger than the direct effects of disturbance from traffic on the road.*” Response: (1) The use of all-terrain vehicles (ATVs) from the proposed road would be prohibited and there would be cable or bollard barriers to emphasize that restriction. In the analysis, the USFWS implicitly assumes that ATVs would be widely used from the proposed road despite the motorized vehicle restrictions. The basis for making that assumption is not provided and should be clearly stated. (2) There is no attempt to quantify the likelihood and magnitude of increased access to Kinzarof Lagoon. A quantitative or qualitative evaluation of the likelihood and

magnitude of increased access to Kinzarof Lagoon, however rough, needs to be conducted before the potential for increased access can be considered high or low. (3) There is no attempt to quantify the indirect effects of increased disturbance and subsistence harvest from increased human access to Kinzarof Lagoon. It is not sufficient to classify those indirect effects as “substantial” or to consider that they “could be much larger than the direct effects...of traffic on the road” without an objective evaluation of the expected level of those effects.

Comment 7: Chapter 4 – Alternative 2 – Birds – General Impacts section, p. 4-136, first paragraph.

Regarding impacts on birds from operation and maintenance of the proposed road, the DEIS states:

*“Although the direct and indirect effects would be high and long term within the localized area resulting in moderate to major effects for some of these common resource species, the effects for the entire project area would be low, long term for these common resource species, resulting in minor effects to the populations.”*

Response: This is an appropriate geographic categorization of the impacts from the proposed road because it specifically addresses the two primary spatial scales (local and regional) that need to be considered when evaluating summary impacts. This approach, however, was not followed in the subsequent impact assessments for specific bird species and species groups (see additional comments below).

Comment 8: Chapter 4 – Alternative 2 – Birds – General Impacts section, p. 4-137, first paragraph.

The DEIS states: *“It is assumed that some level of unauthorized access [from the proposed road] would occur, including access for subsistence harvest purposes, and the impact of it is included in the effects analysis.”* Response: Without some quantitative evaluation or qualitative categorization of the level of possible unauthorized access within the project area, the effects of increased disturbance and mortality to birds are difficult to predict. The DEIS does not provide evidence or justification for the predicted magnitude of impacts to birds from unauthorized access.

Comment 9: Chapter 4 – Alternative 2 – Birds – Tundra Swan and Other Breeding Birds section, p. 4-138, first paragraph.

The DEIS states: *“The southern road alignment crosses through high density swan habitat with numerous observations of pairs and nests occurring in close proximity [to the road].”*

Response: There has been no attempt to quantify how many pairs and nests could occur in close proximity to the potential road. It is not sufficient to state that “numerous” pairs and nests could be disturbed/displaced (as is discussed in subsequent sentences in this paragraph) without some sort of quantification of how many pairs and nests might actually occur in close proximity to the potential road. An analysis of USFWS geospatial data on the locations of Tundra Swan pairs and nests in the Izembek refuge in relation to the Southern Road Alignment proposed in Alternative 2 could be conducted to provide

additional information on this topic (see Quantification of Possible Impacts on Tundra Swans in the main body of the report).

Comment 10: Chapter 4 – Alternative 2 – Birds – Tundra Swan and Other Breeding Birds section, p. 4-138, last paragraph. The DEIS states: *“The direct and indirect effects to Tundra Swans and other breeding birds from the construction of Alternative 2 would be medium to high intensity with short-term disturbance to behavior and permanent displacement of habitat within the road construction area. Effects would be localized or limited in extent, and would affect unique (Tundra Swans) and common (other breeding birds) resources. Construction of Alternative 2 would result in major direct and indirect effects to Tundra Swans and moderate effects to other breeding birds.”* Response: In this case, the USFWS has determined that the effects of construction on Tundra Swans and other breeding birds would be of medium to high intensity without an estimate of how many birds of each species could be affected and without a consideration of how the effects would be manifested at both local and regional scales (only the local scale was considered). The impact assessment could be improved by (1) estimating, at least roughly, the number of birds that could be affected; and (2) assessing the effects at both a local and regional scale. Related to the second point above, this analysis considers that the summary impacts on Tundra Swans would be major despite the fact that the effects would be local or limited in geographic extent. This is a case in which the USFWS has assigned a summary impact level (major) that is not in accordance with the DEIS guidance on deriving summary impact levels from impact criteria; on p. 4-4, the definition for major impacts states that: *“Impacts are generally medium or high intensity, long-term or permanent in duration, a regional or extended scope [emphasis added], and affect important or unique resources.”*

Comment 11: Chapter 4 – Alternative 2 – Birds – Tundra Swan and Other Breeding Birds section, p. 4-139, first paragraph. The DEIS states: *“The potential extent of all-terrain vehicles and foot traffic outside of the road corridor is not known, but it could become substantial over the years as unauthorized trails become established and subsistence harvest of various species expands into the area.”* Response: Although unauthorized ATV and foot traffic could become substantial over time, there has been no attempt to quantitatively or qualitatively estimate, at least roughly, what the level of possible unauthorized access in the project area could be.

Comment 12: Chapter 4 – Alternative 2 – Birds – Tundra Swan and Other Breeding Birds section, p. 4-140, second paragraph. The DEIS states: *“The increased access may also increase hunting pressure on birds, both by humans and other predators. This would increase the amount of disturbance outside the roadway corridor. It is expected that the permanent effect of the road will be a reduction in bird density in an area larger than the project footprint.”* Response: ABR agrees that the construction and use of the

proposed road, along with increased access to areas outside the road corridor, could result in reductions in bird densities in an area larger than the project footprint. However, no attempt has been made to quantify how large an area could be affected outside the road footprint and then to evaluate that effect at both local and regional scales to obtain a more complete picture of the probable impact (see Quantification of Possible Impacts on Tundra Swans in the main body of the report).

Comment 13: Chapter 4 – Alternative 2 – Birds – Tundra Swan and Other Breeding Birds section, p. 4-140, fourth paragraph. The DEIS states: “*The direct and indirect impacts to Tundra Swans and other breeding birds from the operation and maintenance of Alternative 2 would be medium to high intensity with long-term (behavioral disturbance) to permanent (habitat loss) duration of effects with a localized or limited extent. Unique (Tundra Swan) and common resources (other breeding species) could be affected. For Tundra Swans, implementation of Alternative 2 would result in major direct and indirect effects. For other breeding birds, implementation of Alternative 2 would result in moderate direct and indirect effects.*” Response: As noted in Comment 10 above, the USFWS has determined that the effects of the proposed road on Tundra Swans and other breeding birds would be of medium to high intensity without any consideration of how many birds of each species could be affected and without a consideration of how the effects would be manifested at both local and regional scales (only the local scale was considered). Additionally, this analysis considers that the summary impacts on Tundra Swans would be major despite the fact that the effects would be local or limited in geographic extent (see additional information in Comment 10 above.)

Comment 14: Chapter 4 – Alternative 2 – Birds – Tundra Swan and Other Breeding Birds section, p. 4-142, first paragraph. The DEIS states: “*Direct and indirect impacts to Tundra Swans and other breeding birds from Alternative 2 would be medium to high intensity with long-term disturbance to behavior and permanent loss of habitat. Effects would be localized or limited in extent, and would affect unique (Tundra Swan) and common resources. Alternative 2 would have a major effect on Tundra Swans and a moderate effect on other breeding birds.*” Response: As noted in Comment 10 above, the USFWS has determined that the effects of the proposed road on Tundra Swans and other breeding birds would be of medium to high intensity without any consideration of how many birds of each species could be affected and without a consideration of how the effects would be manifested at both local and regional scales (only the local scale was considered). Additionally, this analysis considers that the summary impacts on Tundra Swans

would be major despite the fact that the effects would be local or limited in geographic extent (see additional information in Comment 10 above).

Comment 15: Chapter 4 – Alternative 2 – Birds – Brant, Emperor Goose, and Other Migrating/Wintering Birds section, p. 4-143, third paragraph. The DEIS states: “*The direct and indirect impacts to Brant, Emperor Geese, and other migrating/wintering birds from the construction of Alternative 2 would be low intensity ? temporary (behavioral disturbance) to permanent duration (habitat loss), local extent, and would affect unique resources (Brant), important resources (Emperor Goose), and common resources (other migrating/wintering species). Construction of Alternative 2 would result in moderate direct and indirect effects to these resources.*” Response: The combination of low intensity impacts with a local geographic extent could also reasonably be categorized as a minor-level impact overall (instead of moderate). Granted the impacts range from temporary in duration (behavioral disturbance) to permanent (habitat loss), but as noted in the paragraph above on p. 4-143: “The loss of 107 acres of foraging habitat would have a minor effect due to the abundance of adjacent similar habitat.” It is not clear how low-intensity impacts at a local scale, which are temporary in duration and would entail a minor effect from habitat loss, can be classified as moderate impacts overall. More explanation is needed to support the treatment of these lower-level impact components as moderate overall (which was done for unique, important, and common bird species alike).

Comment 16: Chapter 4 – Alternative 2 – Birds – Brant, Emperor Goose, and Other Migrating/Wintering Birds section, p. 4-143, sixth paragraph. The DEIS states: “*Increased access to the area could affect migrating/wintering birds through increased disturbance and greater hunting pressure. Disturbance during migration or winter could lead to decreased survival if feeding is interrupted repeatedly.*” Response: No quantitative or qualitative evaluation was made of the possible magnitude of these effects, which may occur due to increased access to bird habitats along the proposed road corridor and outside of it from unauthorized access to refuge lands. Because these indirect effects play a prominent role in assessing the summary impact levels for Brant and Emperor Geese in particular, it will be important to make at least a qualitative estimate of the levels of these effects in the EIS. If the impact criteria are a guide, it could be concluded that these indirect effects are considered to be low in intensity because the overall conclusions for impacts to Brant, Emperor Geese, and other migrating/wintering birds list low-intensity impacts (see Comment 19 below). However, the impact components listed in Table 4.1-2 on p. 4-6 only indicate effects for behavioral disturbance and habitat alterations (there are no impact component definitions listed for mortality from increased hunting pressure, for example). For greater

clarity, the possible impacts of increased disturbance and mortality from hunting pressure should be addressed specifically in the EIS for all wildlife species.

Comment 17: Chapter 4 – Alternative 2 – Birds – Brant, Emperor Goose, and Other Migrating/Wintering Birds section, p. 4-144, third paragraph. The DEIS states: “*Access to portions of the refuge outside the roadway corridor using motorized vehicles is also expected to occur despite measures to prevent it. This and increased foot traffic would increase the amount of disturbance outside the roadway corridor. It is expected that the permanent effect of the road will be a reduction in bird density in an area larger than the project footprint.*” Response: As noted in Comment 12 above, ABR agrees that the construction and use of the proposed road could result in reductions in bird densities in an area larger than the project footprint, but no attempt has been to quantify how large an area could be affected outside the road footprint and then to evaluate that effect at both local and regional scales to obtain a more complete picture of the probable impact.

Comment 18: Chapter 4 – Alternative 2 – Birds – Brant, Emperor Goose, and Other Migrating/Wintering Birds section, p. 4-144 to 145. The DEIS states: “*Large equipment used for maintenance, cars, pick-up trucks or all-terrain vehicles stopping along the route, and increased human activity in the area resulting from this improved access, could cause major disturbances to Brant, Emperor Geese, and other migrating/wintering birds.*” Response: It would be beneficial to define what is meant by “major disturbances” in this sentence. Does major mean many birds could be displaced or that small numbers could be repeatedly disturbed? Some quantification or categorization of the possible effects envisioned here, in terms of the estimated numbers of birds involved and the possible timeframes, is warranted; it is not sufficient to simply state that the disturbances could be major. Additionally, the word major is a loaded modifier to use in this context given that the largest summary impacts for all resources are also termed major in the DEIS.

Comment 19: Chapter 4 – Alternative 2 – Birds – Brant, Emperor Goose, and Other Migrating/Wintering Birds section, p. 4-145, second paragraph. The DEIS states: “*The direct and indirect impacts to Brant, Emperor Geese, and other migrating/wintering birds from the operation and maintenance of Alternative 2 would be low intensity ? permanent duration (behavioral disturbance and habitat loss), local extent, and would affect unique resources (Brant), important resources (Emperor Goose), and common resources (other migrating/wintering species). Operation and maintenance of Alternative 2 would result in major (Brant and Emperor Goose) and moderate (other species) direct and indirect effects to these resources.*” Response: In this case, the DEIS determined that the effects of road operation and maintenance on Brant and Emperor Geese would result in major overall, summary impacts

despite the fact that the impact criteria indicated effects of low intensity that were local in geographic extent. Note also that the definition of low intensity impacts for behavioral disturbance (p. 4-6, Table 4.1-2) states that: “Changes in behavior due to project activity may not be noticeable; animals remain in the vicinity.” It is unclear how the DEIS interprets impacts of this magnitude as major at the summary level. Because concerns about increases in mortality from unauthorized access and increased hunting pressure play an important role in this impact assessment, those concerns should be addressed specifically with a quantitative or qualitative categorization of the possible increase in mortality effects. The impact assessment for Brant and Emperor Geese represents another case in which the DEIS has assigned a summary impact level (major) that is not in accordance with the DEIS guidance on deriving summary impact levels from impact criteria; on p. 4-4, the definition for major impacts states that: “Impacts are generally *medium or high intensity* [emphasis added], long-term or permanent in duration, *a regional or extended scope* [emphasis added], and affect important or unique resources.” Additionally, the impacts have been assessed without an estimate of how many birds of each species could be affected and without a consideration of how the effects would be manifested at both local and regional scales (only the local scale was considered). Here again, the impact assessment should be improved by (1) estimating, at least roughly, the number of birds that could be affected; and (2) assessing the effects at both a local and regional scale.

Comment 20: Chapter 4 – Alternative 2 – Birds – Brant, Emperor Goose, and Other Migrating/Wintering Birds section, p. 4-146, third paragraph. The DEIS states: “*Direct and indirect effects to Brant, Emperor Geese, and other migrating/wintering birds from Alternative 2 would be low intensity ? permanent duration (behavioral disturbance and habitat loss), local in extent, and would affect unique resources (Brant), important resources (Emperor Goose), and common resources (other migrating/wintering species), resulting in major (Brant and Emperor Goose) to moderate (other species) impacts to these resources. Alternative 2 would have a major to moderate contribution to cumulative effects on Brant, Emperor Geese, and other migrating/wintering birds. The summary impact of Alternative 2 on Brant, Emperor Geese, and other migrating/wintering birds is considered major (Brant and Emperor Goose) to moderate (other species).*” Response: As noted in Comment 19 above, this analysis considers that the effects of the proposed road on Brant, Emperor Geese and other migrating/wintering birds would result in major overall, summary impacts despite the fact that the impact criteria indicated effects of low intensity that were local in geographic extent. In addition, the USFWS has assessed these impacts without any consideration of how many birds of each species could be affected and without a consideration of how

the effects would be manifested at both local and regional scales (only the local scale was considered). Additional information on these issues is provided in Comment 19 above.

Comment 21: Chapter 4 – Alternative 2 – Birds – Seabirds section, p. 4-157, third paragraph. The DEIS states: “*Direct and indirect effects to seabirds from Alternative 2 would be low intensity, long-term duration, local extent, and would affect common resources, resulting in a minor impact. Alternative 2 would have a minor effect in reducing the cumulative effects on seabirds. The summary impact of Alternative 2 on seabirds is considered minor.*” Response: The impact analysis for seabirds (pp. 4-146 to 4-148) appears to be reasonable and the assessment of an overall impact level of minor seems appropriate. The listing of minor effects overall for seabirds is in accordance with the DEIS guidance on deriving summary impact levels from impact criteria, as noted on p. 4-4. The seabird impact assessment could be improved, however, by specifically addressing impacts at both a local and regional scale.

Comment 22: Chapter 4 – Alternative 2 – Threatened and Endangered Species – Steller’s Eider, Yellow-billed Loon, and Kittlitz’s Murrelet section, p. 4-167, fourth paragraph. The DEIS states: “*Steller’s Eiders and Yellow-billed Loons may experience some disturbance effects from road construction activities occurring during August to November; they are absent from the area during most of the summer construction period. Kittlitz’s Murrelets may experience disturbance effects throughout the construction season but the disturbance would occur only when they fly over the area. Effects would be of low to medium intensity, temporary duration, local extent, and would affect important resources.*” Response: There is no determination of overall, summary impacts from construction activities for these species; only the levels for the impact components are listed.

Comment 23: Chapter 4 – Alternative 2 – Threatened and Endangered Species – Steller’s Eider, Yellow-billed Loon, and Kittlitz’s Murrelet section, p. 4-167, last paragraph. The DEIS states: “*Noise generated by road use could be audible to Steller’s Eiders, Yellow-billed Loons, and Kittlitz’s Murrelets using north Kinzarof Lagoon or the southern edge of Izembek Lagoon.*” Response: This sentence states that noise during operation and maintenance of the road could be audible to Steller’s Eiders, but on p. 4-166 (fourth paragraph), for the construction phase, it is stated that: “*Steller’s Eiders using Kinzarof Lagoon may detect construction noises, but most would likely be far enough away that the sounds would be indistinguishable from background noise.*” Our understanding is that construction noise overall is greater than noise generated during the operation and maintenance phase. These conflicting statements need to be revised to represent the actual expected effects of noise detection by Steller’s Eiders.

Comment 24: Chapter 4 – Alternative 2 – Threatened and Endangered Species – Steller’s Eider, Yellow-billed Loon, and Kittlitz’s Murrelet section, p. 4-168, third paragraph. The DEIS states: “A

*substantial increase in disturbance from gunshots, all-terrain vehicles, and human presence at this time would likely cause molting (flightless) eiders to swim away from preferred feeding areas. This would interrupt their feeding and cause them to expend energy, decreasing their ability to recover from molting, especially if disturbance levels are high and chronic. It may also cause some birds to abandon preferred foraging areas, at least while hunters are present.*” Response: ABR agrees that a substantial increase in disturbance could have these effects on Steller’s Eiders, but it has not been shown clearly that such increases in disturbance will occur. It would be helpful to provide some sort of quantification or qualitative categorization of the possible increase in unauthorized access and disturbance due to construction and use of the proposed road. What is the likelihood that those activities will occur? What would the magnitude of those activities be if they did occur? It is not sufficient to consider that there could be a “substantial increase” in those activities (and to use that possible increase to reach a conclusion of moderate overall impacts on Steller’s Eiders) without some type of estimate of the level of those disturbance effects.

Comment 25: Chapter 4 – Alternative 2 – Threatened and Endangered Species – Steller’s Eider, Yellow-billed Loon, and Kittlitz’s Murrelet section, p. 4-169, fourth paragraph. The DEIS states: “*The overall impact of Alternative 2 on Steller’s Eiders, would be moderate, because Eiders are particularly vulnerable to disturbance during pre-migration staging in the spring and the molt in the fall, and the effects on Yellow-billed Loons, and Kittlitz’s Murrelets is considered minor.*” Response: As noted above in Comment 24, some sort of quantification or qualitative categorization of the possible increase in unauthorized access and the expected increases in disturbance and hunting pressure due to construction and use of the proposed road should be provided to justify the conclusion of overall moderate impacts for Steller’s Eiders.

## **IMPACT ASSESSMENTS FOR TERRESTRIAL MAMMALS – ALTERNATIVE 2**

Comment 26: Chapter 4 – Alternative 2 – Land Mammals – Large Mammals section, p. 4-157, first paragraph. The DEIS states: “*Direct and indirect impacts to brown bears would be high intensity within the vicinity of the road corridor (local) but medium intensity throughout the project area (regional). The effects would be long-term (behavioral disturbance) and permanent (habitat alteration) in duration for this important resource. Bear habitat within the Izembek Controlled Use Area is considered an important resource. The summary impact of Alternative 2 on brown bear is considered major for the isthmus area but moderate for the project area.*” Response: The impact analysis for brown bears (pp. 4-151 to 4-152) appears to be reasonable and the assessment of an overall impact level of major in the isthmus area could be appropriate if one assumes that unauthorized access and hunting will occur widely within the road

corridor. Otherwise, an overall impact level of moderate in the isthmus area is probably more accurate. However, as with the bird impact assessments above, an estimate of the level of expected increased hunting activity along the road corridor would help greatly in interpreting the level of effects. The impact assessment also could be improved by estimating, at least roughly, the number of bears that could be affected by construction and use of the proposed road. As noted for the bird impact assessments above, the possible impacts of increased mortality from hunting pressure should be addressed specifically in the EIS (currently only behavioral disturbance and habitat alterations are addressed specifically with defined impact criteria; see Table 4.1-2 on p. 4-6). The listings of major effects overall for brown bears in the isthmus area, but moderate effects overall in the larger project area are in accordance with the DEIS guidance on deriving summary impact levels from impact criteria, as noted on p. 4-4. The brown bear impact assessment also appropriately addresses impacts both at the local (isthmus) and regional (project area) scales. The impact assessment, however, does not acknowledge the additional brown bear habitat that would receive additional protection when added to the two refuges by the proposed land exchange.

Comment 27: Chapter 4 – Alternative 2 – Land Mammals – Large Mammals section, p. 4-157, second paragraph. The DEIS states: “*Direct and indirect impacts to caribou would be medium intensity, long-term (behavioral disturbance) and permanent (habitat alteration) in duration, could extend to an area larger than the road corridor (regional extent), and would affect important resources. The summary impact of Alternative 2 on caribou is considered moderate. An exception to this impact level determination would be if the road proves to be a barrier to caribou migration. In that case, the impact level for caribou would be major. However, the likelihood of that outcome is judged to be low.*” Response: The impact analysis for caribou (pp. 4-152 to 4-156) is carefully presented and the assessment of an overall impact level seems appropriate (i.e., the listing of moderate effects overall for caribou is in accordance with the DEIS guidance on deriving summary impact levels from impact criteria, as noted on p. 4-4). The DEIS correctly points out that although deflection of caribou movements and delays in crossing the proposed road are possible, the likelihood of the road becoming a perennial barrier to caribou migration is low. The impact assessment for caribou could be improved, however, by specifically addressing impacts both at the local (isthmus) and regional (project area) scales as was done in the brown bear impact assessment (see Comment 24 above).

Comment 28: Chapter 4 – Alternative 2 – Land Mammals – Large Mammals section, p. 4-157, third paragraph. The DEIS states: “*Direct and indirect impacts to wolves would be low to medium intensity, long-term (behavioral disturbance) to permanent (habitat alteration) duration, could extend to an area larger than the road corridor (regional extent), and would affect a common resource. The summary impact level of Alternative 2 on wolves is considered moderate.*” Response: The impact analysis for wolves (p.

4-156) appears to be reasonable and the assessment of an overall impact level of moderate seems appropriate. The listing of moderate effects overall for wolves is in accordance with the DEIS guidance on deriving summary impact levels from impact criteria, as noted on p. 4-4. The wolf impact assessment could be improved, however, by (1) estimating, at least roughly, the number of animals that could be affected; and (2) specifically addressing impacts both at the local (isthmus) and regional (project area) scales as was done in the brown bear impact assessment (see Comment 24 above).

Comment 29: Chapter 4 – Alternative 2 – Land Mammals – Furbearers and Small Mammals sections, p. 4-159, fifth paragraph, and p. 4-161, fifth paragraph. The DEIS considers the expected impacts on furbearers and small mammals to be the same: *“Direct and indirect impacts to furbearers [and small mammals] from Alternative 2 would be low to medium intensity ? long-term (behavioral disturbance) to permanent (habitat alteration) duration, local extent, and would affect common resources. The summary impact of Alternative 2 on furbearers [and small mammals] is considered minor.”* Response: The impact analyses for furbearers (pp. 4-158 to 4-160) and small mammals (pp. 4-160 to 4-162) appear to be reasonable and the assessment of an overall impact level of minor seems appropriate for both species groups. The listings of minor effects overall for furbearers and small mammals is in accordance with the DEIS guidance on deriving summary impact levels from impact criteria, as noted on p. 4-4. The furbearers and small mammals impact assessments could be improved, however, by specifically addressing impacts both at the local (isthmus) and regional (project area) scales as was done in the brown bear impact assessment (see Comment 24 above).

### **IMPACT ASSESSMENTS FOR BIRDS AND MAMMALS – ALTERNATIVE 3**

For Alternative 3, the overall impact levels determined for birds, threatened and endangered birds, and terrestrial mammals are identical to those determined for Alternative 2. Because of this, the comments above for Alternative 2 apply equally well to the impact assessments prepared for Alternative 3. The recommendations noted above for changes in the DEIS for Alternative 2 should be made also in the impact assessments for Alternative 3. There are some slight differences, however, in the rankings of the impact criteria for Alternative 3, and those are addressed in the comment below.

Comment 30: Chapter 4 – Alternative 3 – Birds – Brant, Emperor Goose, and Other Migrating/Wintering Birds section, p. 4-245, second paragraph. The DEIS states: *“The direct and indirect impacts to Brant, Emperor Geese, and other migrating/wintering birds from the operation and maintenance of Alternative 3 would be low to high in intensity, permanent duration (behavioral disturbance) to permanent duration (habitat loss), local extent, and would affect unique resources (Brant), important resources (Emperor Goose), and common resources (other species). Operation and maintenance*

*of Alternative 3 would result in major effects on Brant and Emperor Goose if hunting pressure increases substantially in Izembek Lagoon and moderate direct and indirect effects to other species.”* Response: In this impact assessment for Alternative 3, the impact intensity, which was low for Alternative 2, has been elevated to low to high. This reflects the possibility that hunting pressure could have greater effects under Alternative 3 because the proposed road would be closer to Izembek Lagoon (Izembek Lagoon supports greater numbers of nonbreeding waterfowl than Kinzarof Lagoon and therefore more mortality could occur). The overall impact level of major, however, is the same as for Alternative 2. It would be helpful also in this impact assessment to provide some additional information on the likelihood and magnitude of any increases in hunting pressure in Izembek Lagoon as result of the construction and use of the proposed road. This is an important point because it is the possibility of increased hunting pressure that is the stimulus for elevating the overall impact level to major. It is not sufficient to consider that there could be a substantial increase in hunting pressure (and to use that possible increase to reach a conclusion of major overall impacts) without an estimate of the likelihood and magnitude of any increases in hunting pressure in Izembek Lagoon.



**No Action existing marine transportation: Corps EIS team returning from a hearing in King Cove 2003 when weather at the King Cove Airport was marginal and missing scheduled air service from the Cold Bay Airport would likely result in several days before seats would be available.**



**Fishing Vessel at the Cold Bay Dock. Medivac patients, crew, or passengers must climb 20 vertical ladder from the boat to the top of the dock.**

[Type text]

Land Exchange EIS field team discussion on a section of single lane road about 1 mile from the NeCB Terminal. Road topping shceduled to be placed in 2011. Note adjacent vegetation establishing on the road shoulder and the general absence of road construction damage to adjacent vegetation.

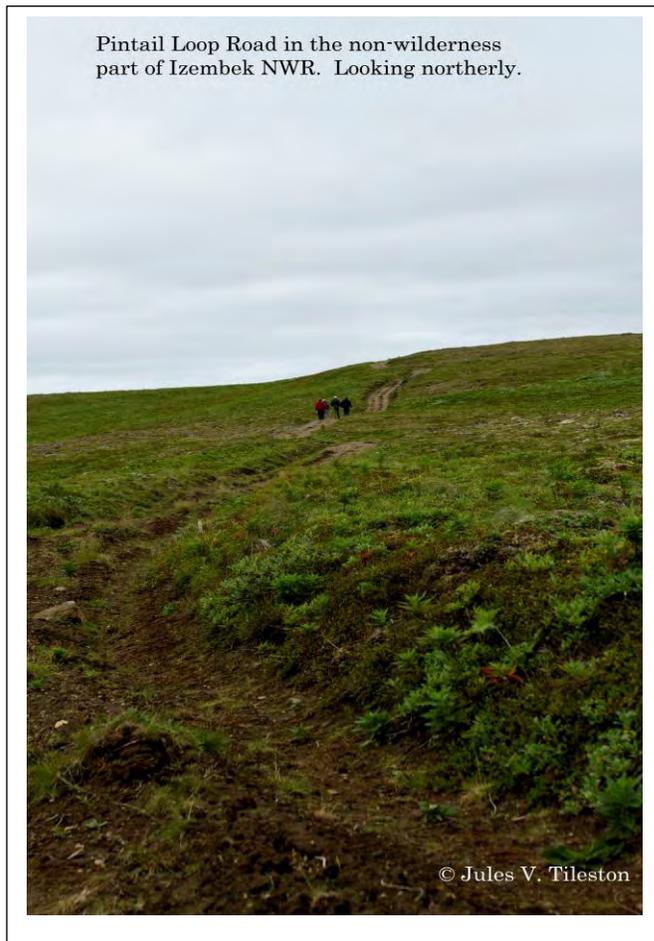


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Log and Marston Mat bridge over stream crossed by Pintail Loop Road in the non-wilderness part of Izembek NWR



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### **DEIS Comments—Full DEIS**

Comments will only be listed on pages where comments are warranted. If a page is not listed, then there are no comments on that page or the issue has been addressed in the overall KCG comments. No Comments provided on any Table of Contents, Chapter 5 or Chapter 6. The majority of the KCG comments provided the Service on the PDEIS are still valid because they were not addressed in the DEIS and are incorporated herein since the Service responded that many of our comments would be addressed when the Final EIS is prepared.

### **Executive Summary**

**General:** Substantial revisions are required to conform to the anticipated revisions of the DEIS. In particular inclusion of acres of habitat gained or lost under each alternative should be clearly shown. The KCG has provided tables showing acreages by the the Sitkinak, State, Mortensens Lagoon, Kinzarof Lagoon, King Cove Corporation Relinquished Selection, Southern Road Corridor, Central Road Corridor and the Kinzaof Lagoon addition to the Izembek State Game Refuge to assist the Service factually inform the public on the magnitude of the more than 69,600 acres of land associated with the Land Exchange. The DEIS does not contain acreage, ownership, or resources associated with the Blinn Lake Parcel that will be administratively transferred from the Alaska Peninsula National Wildlife Refuge to the Izembek National Wildlife Refuge. The 69,600 acres recognizes the fact that 5,430 acres of federal ownership will be transferred to the King Cove Corporation as a replace the 5,430 acres of unique Izembek Wilderness foregone under Alternatives 2 and 3. Many impact conclusions do not seem to be supported by the data contained in the DEIS with the most glaring being the treatment of the Tundra Swan which in turn raises doubt about many other conclusions when viewed beyond the local level.

**ES-23**—Eliminate “major” effects in Paragraph 2 of this page. The original USFWS analysis was a minor effect and nothing has been presented to warrant this change.

**Alternative 5-** The KCG does not understand how or agree that the effect of eventual conveyance of over 5,000 acres of wilderness land to a private corporation could have negligible to minor effect while the conveyance of 206 acres in return for 63,000 acres is not considered negligible to minor or positive.

**ES-24**—The effects table must be conformed to reflect changes recommended in these comments.

Particularly changing the effects on wildlife, cultural resources from major to minor and/or negligible.

### **Ch. 1—Purpose and Need**

**Page 1-2--Add the following to par.1:** add “As a result of the EIS record of decision the funding for airport improvements was not spent. That funding was redirected to the Marine-highway link approved by the Record of Decision for the 2003 EIS.”

**Page 1-4:**—Izembek State Game Refuge, add the word “unanimously” after the words: “the Alaska legislature passed”

**Page 1-5—Add the following to par. 1:**

Any administrative appeal or litigation which delays construction also acts to toll this 7 year expiration of legislative authority.

**Page 1-5—Add a bullet at the bottom of the page:**

“Serving the public interest by implementing the land exchange and subsequent road construction”

**Page 1-6 under Health Safety description—3rd paragraph:**

Delete the word “infrequent” and substitute “regular” before the words “time sensitive” These emergencies happen on a regular basis at all times of day throughout the year—more than at least once a month. This makes the need more than infrequent.

**Same paragraph:**

Delete the word “hovercraft and”—A hovercraft is a marine vessel. Since the hovercraft will no longer be in operation, the reference to hovercraft should be eliminated.

**Re: helicopters at Cold Bay:**

Insert the words “but not steadily” after the word “temporarily”

**Page 1-7:**

Is the requirement for final approach at King Cove to be VFR mandatory? if so, the word “should” needs to be changed to “must.”

**Pages 1-8- —under affordable transportation add the following:**

“Now that the hovercraft service has been eliminated, there is no regular, scheduled, or affordable marine service. The only marine service available is private fishing vessel which requires a 2.5 hour trip and the scaling of a 30 foot ladder in inclement weather which has prevented flights from the King Cove airport. These private fishing vessel trips cost up to \$2500. This eliminates them from any recognition as affordable transportation.”

**Page 1-10—add to the last sentence in the last paragraph the following:**

“tribal” after the word “local”

**Page 1-14:**

The discussion on RAMSAR wetlands needs attention. The KCG requested supplemental information from the Service on the 1986 expansion of the designated RAMSAR wetlands and the Service position

that there were no RAMSAR wetlands associated with the King Cove Corporation ownerships within the exterior boundaries of the Izembek National Wildlife Refuge when the Corps 2003 EIS was being prepared or were RAMSAR wetlands mentioned in any of the Service decisions required under AMCSA Section 22(g). The discussion indicates the Service is obligated to report any change in RAMSAR wetlands. There is no indication the Service made any of the required reports, which further raises serious questions on the validity to the DEIS implication that wetlands on King Cove Corporation ownerships are indeed designated RAMSAR wetlands. Finally, the FEIS should carefully examine the definition of wetlands described in the original RAMSAR designation and determine which of the wetland habitats were designated. To date the Service has provided no documentation showing consultation with the King Cove Corporation or the two Tribes.

### **Chapter 2—Alternatives**

**General:** See KCG December 23, 2011 comments on the PDEIS for recommendations on how to address the former hovercraft operations, which are no longer part of the No Action Alternative.

#### **Page 2-21-39:**

The FEIS summary must be accurate and fully describe all lands listed in Subtitle E. The DEIS tends to ignore both the addition of the Kinzarof Lagoon with its 2,300 acres of eelgrass habitat or the fact that approximated approximately 1,900 acres of unique wetlands will be transferred to the private ownership of the King Cove Corporation under the No Action, Hovercraft and Ferry Alternatives.

#### **Page 2-49:**

There is no description of the values of the lands to be exchanged by State of Alaska and the King Cove Corporation. The final DEIS Executive Summary must contain a full description of this information.

#### **Page 2-52—Changes in the following effects need to be made.**

**Alt 2 and 3**— Applying the DEIS definitions and considering the few vehicles that would use the road on a daily basis and winds, it is questionable that an air quality measuring station on the road would be able to provide any meaningful measurement meeting the assumed overall or cumulative impacts as minor effect. The KCG believes a negligible conclusion is appropriate at the local as well as the

#### **Page 2—Alternative 1**

Geology/Soils--With no hovercraft operation, the effects on Geology and Soils/Cumulative should be changed to "none."

**Page 2-54**

**Hydrology/Cumulative Effects**—Alt. 1 should be changed to “none” since there will be no hovercraft.

Alt. 2 and 3 should be changed to “negligible to minor” since thousands of acres of wetland will be exchanged for the 3.8 acres filled and the 162 drainage structures.

**Page 2-55—Hazardous Materials/Cumulative Effects—**

Alt. 5 includes construction and operation of a ferry terminal and a ferry vessel. Since this is considered negligible, the effects of Alt. 2 and 3 should also be negligible.

**Page 2-56—Noise/Cumulative Effects**

Alt. 5 includes construction and operation of a ferry terminal and a ferry vessel. Since this is considered negligible, the effects of Alt. 2 and 3 should also be negligible.

**Page 2-57—Terrestrial and Aquatic Plant Communities/Cumulative Effects**

While the chart notes that 52,583 acres of new native plant cover is added to the refuge system, it still states the effect is moderate. This is simply not the case. The effects of the land exchange are negligible. The effect also needs to consider substantial vegetation will become Wilderness and most development such as oil and gas leasing on the 41,887 acres of State land with unique habitats for Tundra Swans and Caribou.

**Page 2-58—Wetlands/Cumulative Effects**

While the chart notes that 12,276 acres of new native plant cover is added to the refuge system, it still states the effect is moderate. This is simply not the case. The effects of the land exchange are negligible. Verify the acreage as the KCG analysis of the DEIS data indicates there will be a net increase of almost 13,600 acres of wetlands.

**Page 2-59—Essential Fish Habitat/Cumulative Effets**

**Alt. 1**— no hovercraft means no effect on EFH.

**Alt. 2**—there is no justification for the major designation. The ADF and G control fish harvest and there is no evidence to support any problems. There is no evidence to support any substantial fish harvest pressure from a community of only 700 residents and even fewer fishing license holders. Neither is the probability estimated given the fact that persons travelling from the City of Cold Bay would have to drive at least 20 miles to reach one of these streams of concern while a person travelling from the City of King Cove would drive at least 25 miles. Both scenarios requires an assumption that a person will drive by superior fish streams and shores of Cold Bay accessible by the existing road network.

**Alt. 5**—why is it unlikely that modification of the existing dock in Cold bay would not affect EFH?

**Page 2-60—Birds/Cumulative Effects**

**Alt 1**— no hovercraft means no effect on birds, but why is a hypothetical operation which is as noisy as an airplane would have only a minor effect on birds? The completion of the KCAP access road is not a subject of this EIS and any effect on birds or any other resource must be eliminated. However, the transfer of 5,430 acres with unique Tundra Swan habitat would have a negative effect since these habitats could be subject to future development that are not permissible on land maintaining its Wilderness status under Alternatives 2 and 3.

**Page 2-64-5-Threatened and Endangered Species/Cumulative Effects**

**Alt 1**—no hovercraft means no effect on these species

**Alt 2-** KCG does not understand the moderate effect on Steller Eiders since current hunting operations are already in place. This should be reduced to negligible to minor.

**Alt 3**—The Central corridor was nominated by the Service. The KCG does not agree that this will increase access to Izembek Lagoon since the entire shoreline will be Wilderness and according to the existing transportation information in the DEIS does not show any existing vehicle access to Kinzarof Lagoon. .

**Alt. 5**—Steller’s Eider are not present during Cold Bay dock construction but the DEIS says these birds could be disturbed by road construction during the same seasonal period. This does not make sense and needs to be clarified to all alternatives being negligible as noted in the cumulative effects section of this alternative.

**Page 2-67-8—Socioeconomics/Cumulative Effects**

This entire section must be rewritten to reflect the situation in the community re assumed hovercraft operations will exist under the No Action Alternative.

**Alt.1**—the Hovercraft will not be restarted and the Borough will not commit \$1 million to hovercraft operation for all time.

**Alt.2 and 3**—this shows the Service’s inherent attitude to ignore the needs of King Cove residents. While stating that truly minor issues will have major effects on birds and land mammals, but the Service cannot bring itself to direct the contractor to honestly evaluate the effect on socioeconomics for the residents of King Cove which are a major positive beneficial effect for ALL residents of King Cove.

**Alt 2 or 3** -- The KCG agrees with the Service there will be major socioeconomic effects. However one additional modifier should be added when the FEIS is prepared – Major “Beneficial” effect.

**Alt 4**—The source of the estimated \$2 million annual subsidy that accommodates only 50 percent of the demand for access to and from the Cold Bay Airport with a new hovercraft with an estimated acquisition

cost of at least \$9,000,000 should be discussed in the FEIS. Also the estimated cost assumes the AEB hovercraft will be available at no cost under Alternative 4. It will not, and the operational characteristics of AEB hovercraft are now known to not provide either reliable or cost effective operation.

**Alt. 5**—As with the Hovercraft there is no construction, acquisition, or operational funding and no prospective applicant given an estimated annual operating cost \$2,300,000 to serve only one half of the demand to get to and from the Cold Bay Airport.

**Page 2-68—Transportation/Cumulative Effects:**

**Alt. 1**—No hovercraft means no benefit to passengers lacking safe, reliable and affordable means of getting to and from the Cold Bay Airport.

**Alt. 4 and 5**—Why is the projected passengers for these 1500 but only 1000 for alt. 1? Please explain.

**Page 2-69—Public Health and Safety/Cumulative Effects:**

**Alt 1**—No hover craft means no solution. This is a major negative effect.

**Alt 2 and 3** -- Properly recognizes the major (beneficial) effect for this category. Why not for others such as socioeconomic and transportation? For what emergency is road not appropriate considering the alternatives of medivac usually to Cold Bay airport?

**Page 2-70—Environmental Justice/Cumulative Effects:**

**Alt 2 and 3**—the environmental justice effect for both of these should be major (beneficial) as explained but not properly evaluated in the graph. How do major and minor (beneficial effects) add up to no adverse effects?

**Page 2-71—Public Use/Cumulative Effects**

**Alt 2 and 3**-- The effects to the public use of the areas is major (beneficial). Addition of private land in federal ownership is clearly beneficial to public use. This need to be reflected in the graph.

**Page 2-72—Subsistence/Cumulative Effects:**

**Alt 2 and 3**—The effects of more public land available to any potential subsistence user is major (beneficial) rather than being restricted only to King Cove Corporation shareholders and invitees,

**Page 2-73—Cultural Resources/Cumulative Effects:**

**Alt. 2 and 3**—stated another way—the effect on King Cove ancestors via potential disturbance of their ancestors archeological sites is major but not to their culture needs now. The federal and state process and the mitigation measures fully deal with this potential disturbance. If the effect is major, it is major (beneficial). In fact, the real effects are negligible to minor.

**Page 2-75-76—Wilderness/Cumulative Effects:**

**Alt 1**—No hovercraft means 5,430 acres of unique Izembek Wilderness will be transferred to the King Cove Corporation.

**Alt. 2 and 3**—The effects are major but these are major (beneficial). The addition of the wilderness acreage is not properly evaluated.

**Chapter 3 Affected Environment/Physical Environments**

**General Comments**—Why are there no specifics on the exchange lands? Is the general Cold Bay region data adequate? Definitely Not. See the KCG othe comments for details which this DEIS left out.

**Paragraph 2** add the words “ or Alaska Peninsula Refuge or potential exchange lands” at the end of the first sentence.

**Chapter 3.3—Affected Environment/Social Environment****Page 3-198—5<sup>th</sup> full paragraph:**

At the end of the 2<sup>nd</sup> sentence add the following: The Kinzaroff designation as a State Game Refuge does not take place unless the land exchange is completed.”

**6<sup>th</sup> paragraph—Add the following:**

“The 17(b) easement on the King Cove Corporation lands exchanged at Mortensons Lagoon is not extinguished because that land is not conveyed under the terms of the exchange. Note: The KCG has repeatedly requested the Service to provide a graphic with the 17(b) easements shown in relationship to the existing transportation system. For example, there is at least one T-road heading westerly from the Mortensens Lagoon road. Is this an easement that will be extinshished by the Service and closed to public access. Likewise the 17(b) easement from the east shore of Cold Bay to the Izembek Wilderness should be discussed in the FEIS under the Alternatives 1, 4, and 5 where the 5,430 acres of Izembek Wilderness will be transferred to private ownership by the King Cove Corporation.

**Page 3-202—Paragraph re: RCA Alaska Communications Inc. Parcel:**

**Add the following at the end of the last sentence:** “or obtained by eminent domain as necessary.”

**Page 3-209— Add the following:**

“Section 1039(c) of ANILCA states that ANCSA land within a Conservation Unit is not part of the refuge.”

**Add the following on paragraph discussing Mortensens Lagoon**

“Under ANILCA, ANCSA land is not a part of the Refuge and management policies of either the Alaska Peninsula or the Izembek National Wildlife Refuge do not apply to these private ownerships.

**Pages 3-212-259—Population and Demographics****Page 3-223—**

There is a long paragraph about the male dominated populations in the City of King Cove and the Borough. No similar paragraph for race that shows Cold Bay to be overwhelmingly white and not Native as in the rest of the Borough.

**Page 3-234—239**

Why is federal employment data not included in the pie charts for each City?

**Page 3-245 –**

The explanation on needs to be footnoted on the table on these pages. Otherwise the table is incomplete.

**Page 3-267— King Cove Airport**

The description for VFR at King Cove Airport seems correct and is more detailed than in the executive summary and Ch. 1 or 2. This should be substituted in those places.

**Page 3-270-- Hovercraft**

The section must be rewritten to reflect permanent suspension of Hovercraft operations.

**Page 3-286—Marine Transportation**

3rd paragraph—following the words “hovercraft service was suspended after 2010

add the following—“ and will not be resumed.”

How does Cold Bay have higher poverty rate with much higher median family income of \$147,917 than King Cove?

**Page 3-293—Public Use**

The Service should clearly and clearly state that the waters, submerged land, eelgrass beds and intertidal shoreline of both Kinzarof Lagoon or Izembek-Moffett Lagoons are in exclusive State ownership.

**Page 332—Delete Picture of Hovercraft**—this is misleading the public that the vessel is still a viable option.

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**Page 349—last paragraph**

Add the following: “The area is not untrammled. It has over 35 miles of road and many remnant evidence of vehicle use before the Wilderness was established in 1980, It is only accessible by land because of the road system which was and is in existence. Congress recognized this in the passage of ANILCA and in the passage of the Izembek Land Exchange Act. This area has different characteristics and Congress has pre-approved a road through this wilderness if the Secretary of Interior finds it in the public interest.”

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**Chapter 4. Environmental Consequences**


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**General:** Substantial revisions are required to conform to the anticipated revisions of the DEIS. In particular inclusion of acres of habitat gained or lost under each alternative should be clearly shown. The KCG has provided tables showing acreages by the the Sitkinak, State, Mortensens Lagoon, Kinzarof Lagoon, King Cove Corporation Relinquished Selection, Southern Road Corridor, Central Road Corridor and the Kinzaof Lagoon addition to the Izembek State Game Refuge to assist the Service factually inform the public on the magnitude of more than 69,600 acres of land associated with the Land Exchange. The DEIS does not contain acreage, ownership, or resources associated with the Blinn Lake Parcel that will be administratively transferred from the Alaska Peninsula National Wildlife Refuge to the Izembek National Wildlife Refuge. The 69,600 acres recognizes the fact that 5,430 acres of federal ownership will be transferred to the King Cove Corporation as a replace the 5,430 acres of unique Izembek Wilderness foregone under Alternatives 2 and 3. Many impact conclusions do not seem to be supported by the data contained in the DEIS with the most glaring being the treatment of the Tundra Swan which in turn raises doubt about many other conclusions when viewed beyond the local level.

**Page 4---10-11 --**

Delete reference to the AEB hovercraft resuming operation.

**Page 4- 13 –**

Delete reference to hovercraft on the bullet list at top of the page. Delete Hovercraft— 590 tons per year on Table 4.2.1-2

**Page 4- 15–**

Delete 127 cars and revise to appropriate number equivalency based on ferry only.

**Page 4- 16 –17-- Geology and Soils Conclusion**

Revise to reflect no hovercraft effect on Geology and Soils

**Page 4- 18 –19—Hydrology**

Revise to reflect no hovercraft effect on Hydrology

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**Page 4- 20---21 –**

Revise to reflect no hovercraft effect on Hazardous materials

**Page 4- 22-23—Noise**

Revise to reflect no hovercraft effect on Noise

**Page 4- 26 –30—Essential Fish Habitat**

Revise to reflect no hovercraft effect on EFH

**Page 4- 33 –34—Land mammals**

How can conveyance of 5,000\_acres of high quality bear habitat and 400 acres of high density bear denning habitat be negligible to minor and 201 acres be to state is major?

**Page 4- 35-41—Marine Mammals**

Revise to reflect no hovercraft effect on Marine Mammals. Including rewrite of mitigation measures now not needed in Alt. 1.

**Page 4- 42-52—Threatened and Endangered Species**

Revise to reflect no hovercraft effect on\_Threatened and Endangered Species. Including rewrite of mitigation measures now not needed in Alt. 1.

**Page 4-63-72—Transportation**

Revise to reflect no hovercraft effect on\_Threatened and Endangered Species. Including rewrite of mitigation measures now not needed in Alt. 1.

**Page 4-76-79**

Delete reference to hovercraft restarting in 2012. Fix or eliminate reference to 2003 which apparently came from KCAP EIS in Par, 1

Delete all references to hovercraft in remaining paragraphs. Delete mitigation measure of outside funding. There will be no hovercraft and there is no source for this funding.

**Page 4-80**

Delete Paragraph re : hovercraft as alterative

**Page 4—85-Public Use**

Negligible is the wrong category for evaluation of effect on public use. The effect is permanent and observable. This qualifies as MAJOR under page 4-4 criteria

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**Page 4—88--Cultural Resources**

Effect on trust responsibility is a cultural resource and should be evaluated here. The effect of No Action on cultural resources for the tribes and its member is MAJOR (not beneficial) It is permanent, can be measured by loss of life and/or deleterious effect on medical health of tribe members.

**Page 4-92—94--Wilderness**

Delete sentence on hovercraft which is stand-alone 3<sup>rd</sup> Paragraph, page 92. Delete reference to Hovercraft on page 93. Also why are existing approved effects of KCAP road construction listed as if new effects? These are approved and not subject to this analysis. If mentioned, the fact that these are not part of the projects needs to be clearly stated.

Effect on wilderness and cumulative effects should be MAJOR. This meets the long term, permanent, measurable effects described on Page 4-4. Delete Mitigation Measures since no hovercraft use.

**Page 4—95-99--Air Quality**

Effect on Air quality is negligible: “low intensity, localized, and do not effect unique resources. See p. 4-4.

**Page 4—106—Geology and Soils**

Why is disturbance of 10 acres a moderate rather than minor impact. Also, where is the counterbalance for the 50,800 acres traded to offset this 10 acre disturbance?

**Page 4—107-Hydrology**

Why is disturbance of 3.8 acres of wetlands a moderate rather than minor impact? Also, where is the counterbalance for the 13,600 acres of wetlands added to the Refuge System (86 percent are unique wetlands in Congressionally designated Wilderness) that for any other project would be considered “compensation” under the Corps 404 process? If fact, almost of 12 acres of unique wetlands comprising islands in the mouth of Kinzarof Lagoon were added to the Izembek Refuge as compensation for wetlands lost as a direct result of constructing the authorized upon completion of the Corps 2003 KCAP EIS.

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# STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF PROJECT MANAGEMENT AND PERMITTING

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May 18, 2012

Stephanie Brady  
Project Coordinator  
U.S. Fish and Wildlife Service  
1011 East Tudor Road,  
Anchorage, AK 99503

Re: Izembek Land Exchange Draft EIS

Dear Ms. Brady,

The State of Alaska has reviewed the Draft Environmental Impact Statement (DEIS), for the proposed Izembek Land Exchange, for the purpose of constructing a single-lane gravel road between the communities of King Cove and Cold Bay, Alaska. The comments provided are intended to help the U.S. Fish and Wildlife Service (Service), as the lead federal agency, comply with the National Environmental Policy Act (NEPA) and its implementing regulations. The following comments are a consolidated view of the State.

It remains the State's position that the EIS should only evaluate alternatives that are reasonably based on the direction provided in the *Omnibus Public Land Management Act of 2009* (the Act). We believe those to be the road corridor alternatives and the no-action alternative. The remaining alternatives do not meet congressional intent for the purposes of the land exchange. Furthermore, it is questionable whether the water-based alternatives are financially feasible for the communities they are intended to serve. If the marine methods of transportation were adequate to meet the communities' needs or were financially feasible, there would be no need for the State, the King Cove Corporation (KCC), Inc., and the federal government to negotiate a land exchange, and go through the legislative and congressional approval processes.

## DESIGN LEVEL IS INADEQUATE TO DETERMINE CORRIDOR WIDTH

The Act requires the Service to prepare an Environmental Impact Statement (EIS) to evaluate the potential effects construction and operation of a road between the communities of King Cove and Cold Bay would have, while only transferring the minimum acreage of federal lands required for construction of the road corridor. The Act also requires that applicable State design standards be used to develop the road.

The Service used a 35 percent design level to develop the two road corridor alternatives. In addition, the document states that "Consistent with this level of design, a centerline survey, geotechnical investigations, or other detailed site surveys have not been completed" (p 2-27). The State refers to the Department of Transportation & Public Facilities' (DOT&PF)

Preconstruction Manual for its design standard, which does not describe a 35 percent design. However, the Preconstruction Manual's description of a reconnaissance study (Chapter 430.3) provides a comparable level of design.

A reconnaissance study is used to identify a problem, and describe technically feasible alternatives prior to the initiation of an EIS or environmental assessment. It is a qualitative analysis comparing alternatives using factors like alignment, grade, width, length, cost, soils, drainage, constructability, maintenance, right-of-way, wetlands, historic and cultural sites and other environmental indicators. While we believe that Alternatives 2 and 3 have been developed in sufficient engineering detail to compare the design characteristics, environmental impacts and costs, we do not believe there is enough detail provided by the 35 percent design to determine the minimum corridor width necessary to construct and operate a single lane two-way gravel road.

Therefore, we remain strongly concerned that the 100-foot corridor width proposed by the Service will not be adequate for the entire corridor. For example, the plan's design sheets in Appendix E have multiple locations where embankment fills and cuts extend near the 100-foot right-of-way limits. It is difficult to discern the cut slope angle at these locations, but if steeper slopes are being used to stay within the 100-foot corridor as indicated in previous plans (e.g. 2:1 cut slopes), there could be slope stability problems. We request the Service revisit this issue and begin a dialog with our real estate staff to resolve the issue of conveying title for a corridor, which will support the construction of a road that meets State design standards, as directed in the Act.

Furthermore, the DEIS says that "should the Secretary determine that the proposed land exchange and the proposed road is in the public interest, then the alignment and design of the road would be refined..." (p 1-11). The Final Environmental Impact Statement (FEIS) needs to clearly explain this process or refinement.

#### PERMITTING

The DEIS states in several locations (e.g. Chapter 1.5 Scope of Analysis and Decisions to be Made) that the EIS can be used by other agencies to support their regulatory and permit decisions, such as the Federal Highway Administration (FHWA) and the U.S. Army Corps of Engineers (Corps). However, the DEIS will not fulfill this intent, particularly with regard to the Corps. The DEIS states, "The Corps' role as a cooperating agency is to ensure that the EIS process considers the Corps' requirements under NEPA and the Section 404(b)(1) Guidelines" (p 1-10). It also states, "The Corps would evaluate the proposal and determine if the proposed action is the least environmentally damaging practicable alternative..." (p 1-11).

It remains our opinion that the DEIS has not adequately evaluated the potential impacts to wetlands in sufficient detail for the Corps to determine a Least Environmentally Damaging Practicable Alternative (LEDPA). Furthermore, the wetlands have not been evaluated in sufficient detail for the Service to meet its obligation under Executive Order 11990, (Protection of Wetlands), particularly by deferring mitigation to the ADF&G and Corps (p 4-125). In addition, the document states that the "...wetland boundaries are not intended to meet the requirements established by the Corps for Section 404 of the *Clean Water Act*..." (p 3-45).

However, the document also says that the “EIS must address the total proposed project, alternatives, environmental impacts and mitigation measures” (p 1-9). These statements appear contradictory.

#### DISPOSAL SITES

There is little discussion in the DEIS regarding the disposal of unusable excavated material. DEIS Table 2.4-2 shows 0.3 and 2.4 acres of uplands reclaimed with excavated material in Alternatives 2 and 3 respectively. It is likely that both Alternatives 2 and 3 would generate a large volume of unusable material since much of the area could have a thick layer of organics and/or volcanic ash at or near the surface. It is also possible that because of the local climate, excavated material would be too wet to compact and that drying the material would not be feasible. Therefore, the FEIS should have an expanded discussion of construction sequencing and methodology for each alternative. This should include an analysis of the roadbed width necessary for construction traffic. Material sources should also be discussed.

#### ENVIRONMENTAL CONSEQUENCES FOR FISH AND WILDLIFE

The DEIS presents greater environmental effects on various species than what was presented in the preliminary DEIS. This is disconcerting because cooperating agencies were not consulted on this change in approach. Furthermore, in our review of the preliminary DEIS, the State did not find sufficient information to indicate major effects to fish and several bird species (e.g., tundra swans). Our page specific comments include recommendations for additional information that should be incorporated in the FEIS to fully analyze adverse effects associated with the road alternatives.

In addition, chapter 2.8 (Comparison of Alternatives) defines impact indicators as Negligible, Minor, Moderate and Major. We believe that these indicators as described on page 2-51 can easily default to a “major” effect, which is not supported by the data. The designations also seem to be arbitrarily assigned. For example, in Table 2.8-1 (Impact Summary by Alternative), under Air Quality, all five alternatives read “The total estimated annual emissions would consist of small emission sources operating intermittently, and spread out over a relatively large area,” yet alternatives 1 and 4 are considered to have “negligible” impact, and alternatives 2, 3 and 5 are considered “minor.”

#### ENVIRONMENTAL CONSEQUENCES - EFFECTS AFTER IMPLEMENTATION OF MITIGATION MEASURES

Chapter 4 of the DEIS describes potential effects to various resources for each alternative. Summary level impacts are assigned for each resource regarding effects of construction, compared to effects of operation and maintenance. The DEIS then discusses predicted effects after implementation of mitigation measures for each resource (e.g., Fish Resources and Essential Fish Habitat). The DEIS often indicates that the mitigation measures would reduce many of the effects on a particular resource, but would not completely eliminate all potential effects. Unfortunately, the DEIS does not identify a summary impact level category to a resource, which would take into account the mitigation measures. Consequently, it is difficult to predict what the overall resulting effect would be to a resource. We recommend that the FEIS include a summary

impact level category to all resources which would take into account the implementation of mitigation measures.

#### IMPLEMENTATION OF LAND EXCHANGE BENEFITS TO OFFSET IMPACTS FROM CONSTRUCTION, OPERATION AND MAINTENANCE

Evaluation of the land exchange and road corridor project under NEPA has been a challenge when considering effects from exchanging land and then constructing a road (or other alternative) to connect the communities of King Cove and Cold Bay. The DEIS identifies overall and cumulative impacts to various resources for each alternative. The DEIS also attempts to evaluate effects of the land exchange on land use and management. However, the document does not clearly describe how the effects of the land exchange would mitigate for project-specific impacts. Such an evaluation would improve the decision-makers' and the public's ability to consider any trade-offs between the environmental impacts of road development, and the environmental benefits of an additional 41,000+ acres of lands designated as wilderness.

#### CONTAMINATED LANDS

The State again requests that the Service include an analysis of potential environmental remediation of the contaminated lands on Sitkinak Island. Environmental remediation must take place prior to transferring title of those lands to the State. As stated previously, the State would entertain a phased approach, but cleanup efforts would need to commence as soon as possible. Furthermore, it is unclear if a phased approach can be implemented given the Act's expiration of legislative authority provision.

#### WILDERNESS

The Wilderness section (chapter 4) does not present a "*full and fair*" discussion as required by NEPA (40 CFR 1502.1), and must be significantly revised in the FEIS to address the following issues. Despite the fact that as a result of the land exchange the Izembek Wilderness would gain approximately 41,000 acres, this analysis focuses almost entirely on the impacts of a loss of approximately 130-150 acres. The only value attributed to the added Wilderness acreage is characterized as "*The magnitude of this impact would be considered medium...*" (we assume positive) but is immediately dismissed with the following statement "*...the parcels that are identified for addition to Izembek Wilderness are adjacent to existing wilderness and would not noticeably change the overall character of existing wilderness*" (p 4-210).

There is much discussion about what would be lost in terms of recreational opportunities, ecological integrity, visual and noise disturbances as a result of the proposed road corridor; however, there is no recognition that the lands gained in the exchange would increase the acreage of the Izembek Wilderness by nearly 20 percent; the majority of which would be far enough away from the proposed road so as to not affect visitors' wilderness experiences or be threatened by invasive species. The benefits associated with the designated Wilderness gained in the land exchange must also be identified and factored into the analysis in accordance with 40 CFR 1508.8, which defines "effects" to include "*...those resulting from actions which may have both beneficial and negative effects.*"

The discussion under “Undeveloped Quality” acknowledges that the Alaska National Interest Lands Conservation Act (ANILCA) allows the use of snowmachines, motorboats, airplanes and subsistence use of off-road vehicles (ORV) in designated wilderness. However, the analysis does not factor in these other modes of access and attributes the “*high intensity, permanent, regional impacts to a unique resource,*” to what is expected to be “*low levels of daily traffic*” on the proposed road, and a potential for unspecified “*unauthorized motorized use*” on adjacent wilderness lands, even though the proposed road would include barriers to prevent access to adjacent lands (p 4-212). Essentially, the only motorized modes of transportation *not* currently allowed in the Izembek Wilderness are road vehicles and recreational ORV use, and if the Service tolerated unauthorized use to the extent that it would cause major damage to refuge resources, it would not be fulfilling its legal requirements under ANILCA and the Refuge Improvement Act. Given this baseline, the level of impact resulting from both legal and unauthorized motorized use on designated Wilderness would be considerably less than concluded in this section.

State ownership of submerged lands within the exchange parcels is also discussed in the “Undeveloped Quality” section as being detrimental - “*potentially compromising the Service’s ability to protect the wilderness character of the area*” (p 4-212). Given that the same land ownership pattern exists on current refuge lands, and the Service determined in this DEIS that the “*trend for [all] qualities of wilderness character is currently stable*” (p 3-347 through 3-349), it is unlikely that these state inholdings would negatively impact wilderness character on refuge lands in the future.

In addition, designated wilderness is managed under federal law and policy. We therefore request the FEIS not rely on the personal views of Landres, et. al., in *Keeping it Wild* for this discussion, and instead base the analysis on relevant law and policy. As noted on the first page of *Keeping it Wild*:

*This publication is a report developed by a technical working group and solely represents the views of its authors. It does not represent and **should not be construed to represent any agency determination or policy.** [Emphasis added]*

We also question that the Izembek Wilderness is somehow unique as represented in the following conclusion “*Due to the unique context of the Izembek Wilderness, the direct and indirect impacts to the wilderness character....would be considered major*” (pg. 4-214). There are over 50 million acres of designated wilderness in Alaska and over 100 million acres nationally. We request any modifier that portrays the Izembek Wilderness as a unique resource, based solely on it being designated Wilderness, be removed.

#### STATE AND CORPORATION LAND VALUES

In general the DEIS under represents the State and King Cove Corporation Inc. land values involved in the proposed land exchange. If title is transferred to the FWS, these lands and their potential development, recreational use opportunities and other important values will be affected. The FEIS must address these potential impacts. If a land exchange is authorized and large tracts of land are designated as wilderness, public use of these lands will be dramatically different than

what is currently allowed under state management; this important distinction must be captured in the FEIS.

The DEIS gives the impression that the non-federal lands involved in the exchange lack potential for development. This assumption is incorrect, especially regarding the Corporation lands that enjoy all the attributes of private landownership.

In addition, the Affected Environment Section of the DEIS fails to take into consideration the hydrocarbon potential on the state lands being offered in the exchange, which are high for gas and moderate for oil. If lands are exchanged, the State will lose the ability to develop these resources. This must be accounted for in the FEIS in order to adequately inform the decision-makers.

Thank you for the opportunity to provide comments on the DEIS for the proposed Izembek Land Exchange. The state of Alaska remains a strong supporter of a road alternative. We look forward to working with Service to bring a road to the people of King Cove. If you have any questions please do not hesitate to contact me.

Regards,



Samantha Carroll  
Large Project Coordinator

Enclosure: DEIS page specific comments  
Generally Allowed Used On State Land – fact sheet

# Izembek National Wildlife Refuge Land Exchange/Road Corridor Preliminary Draft EIS Review Comments

May 18, 2012

Commenter(s): Samantha Carroll/ ANILCA Team / DGGS

Tribe/Agency/Organization: Alaska Department of Natural Resources

Chapter	Page	Section	Paragraph	Comment	Suggestion
1	1-9	1.5	7	The text says that “The EIS must address <u>the total proposed project</u> , alternatives, environmental impacts and mitigation measures.” In order to meet this intent the Service must adequately evaluate a sufficient road corridor that will allow for the construction of the road.	
1	1-11	1.5	1	“...design of the road would be refined...”	The Service needs to provide a discussion as to how this “refinement” will be accomplished
1	1-21	1.6.3.2	1	“...extension that reaches as much as 3 miles seaward...”	Check with ADF&G to ensure this figure is correct. I recall it being one mile.
1	1-25	1.6.4	1	First bullet needs to be corrected	Alaska Department of Natural Resources, <u>Division of Mining, Land and Water, Water Section’s permit for Temporary Water Use Permit</u>
1	1-25	1.6.4	1	Second bullet needs to be corrected	Alaska Department of Natural Resources, <u>Division of Mining, Land and Water, Southcentral Regional Office’s</u> authorization for rights-of-way or tideland leases...
2	2-22			Figure 2-6 is on page 2-22 but the narrative explanation of the figure is on page 2-36	Insert the figure closer to the text
2	2-27	2.4.2	4	The Service needs to evaluate if the RCA Alaska Communication, Inc. parcel along the road routes would authorize use, upgrades,	Evaluate for the FEIS

Chapter	Page	Section	Paragraph	Comment	Suggestion
				and maintenance of the proposed road. Or the Service needs to develop an alternate route around this parcel.	
2	2-4	2.4.3	2	“Final project design and construction details may be different”	Elaborate on this – what restrictions will there be between the information provided in the FEIS/ROD and the actual land exchange corridor and mitigation plan.
3	3-14	3.1.3.7		This section does not include mineral potential for the two Townships of state land involved in the land exchange.	Include mineral data for the state lands and corporation lands if appropriate. If this date is included in the analysis the FEIS needs to articulate it.
3	3-196	3.3.1.	1	The State was not aware that the Service would retain an interest on Sitkinak Island for the road right-of-way. The documents say “This interest would not be extinguished unless specific action is taken to release it.”	Elaborate on this – why and for what purpose would the Service retain a road right-of-way?
3	3-261	Figure 3.3-19		I believe the AK Peninsula boundary is incorrectly displayed.	Fix in FEIS
3	3-300	3.3.6	4	What will happen to the Mortensens Lagoon cabins if the FWS gains ownership of this parcel	Address in FEIS
3	3-207	3.3.1	4	Bristol Bay Area Plan: The DEIS says that the “General use areas are...considered <u>unsuitable</u> for intensive development.”	Replace “unsuitable” with: <u>are generally not considered suitable for development.</u> Use this language in all sections.
3	3-305	3.3.10	3	Bristol Bay Area Plan: The DEIS says that the “..management regime... considers the area as unsuitable for intensive development.”	Replace “unsuitable” with: <u>are generally not considered suitable for development.</u> Use this language in all sections.
4	4-1	4.1		All impact categories should follow the format	Consistently apply to all impact

Chapter	Page	Section	Paragraph	Comment	Suggestion
				defined in the Analysis Methods and Impact Criteria section. Sometimes the information is there and for other impacts it is not.	categories
4	4-3	4.1.3		All impact categories should follow the format defined in the Methods for determining level of impact section. Sometimes the information is there and for other impacts it is not.	Consistently apply to all impact categories
4	4-4	4.1	4	“The terms used in the qualitative thresholds are relative, necessarily requiring the analysts to make a judgment about where a particular effect falls in the continuum from negligible to major.” This statement is of great concern. The statement essentially says the qualitative thresholds are relative, meaning by definition, is a point of view that has no absolute validity, having only relative, subjective value given the differences in perception and consideration. And that the analyst must make a judgment call. An EIS should only include professional judgments. This comment also gets at our overarching comment regarding the impact levels given to some of the wildlife species.	
4	4-128	1.3.2.3	6	This area is not confined to foot travel. Subsistence users are permitted to use approved motorized vehicles in wilderness as authorized by ANILCA	Remove the statement
4	4-123	4.3.2.2.	4	“...the terms of the Ramsar Convention constitutes a solemn treaty and are binding in international law...” Whiles there are no punitive sanctions for the violations of or defaulting upon treaty commitments, how is	Clarify what the consequences are and how international law may affect the project. will this designation affect the land exchange?

Chapter	Page	Section	Paragraph	Comment	Suggestion
				this treaty binding in international law?	
4	4-176	4.3.3.1	7	State parcels: "The area plan considers these lands generally <u>unsuitable</u> for intensive development."	Replace "unsuitable" with: <u>are generally not considered suitable for development</u> . Use this language in all sections.
4	4-174			Formatting is inconsistent – underline of subject titles and no underline.	
3				This chapter needs to include an analysis of the affected social and economic elements of the State and KCC lands. If title is transferred to the FWS, these lands and their potential use and development opportunities will be affected. The DEIS needs to address the potential loss of opportunities to generate revenue of these lands if they become designated as wilderness, where the State's Generally Allowed Uses on State Land will be removed.	
4	4-176	4.3.3.1	7	This section needs to incorporate a discussion about the State's Generally Allowed Uses on State Land, regarding travel across state land, access improvements to state land, removing or using state resources, etc.	The SOA Fact sheet titled Generally Allowed Used On State Land language should be incorporated. This document is provided as an enclosure to the State's comments
1	1-13		2	Section 804 of ANILCA provides a priority opportunity for consumptive uses, instead of an across the board subsistence priority on public federal lands and waters. Moreover, the federal subsistence priority only applies on waters with a federal reserved water right. We request the following edit for clarification.	

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<p><i>... establishes a subsistence <u>priority harvest opportunity</u> on federal public lands and waters <u>with a federal reserved water right</u>...</i></p>	
1	1-13	1.6.1.2.	1	<p><u>Alaska National Interest Lands Conservation Act, 1st paragraph, last sentence.</u> This sentence is awkward as it highlights only one, instead of the several wilderness management Sections of ANILCA. Since the ANILCA wilderness management and access provisions are covered in detail in the following paragraphs,</p>	<p>we suggest the following rewrite,</p> <p><i>In Title VII, Congress designated approximately 300,000 acres of Izembek National Wildlife Refuge as wilderness (Section 702). It is managed in accordance with the Wilderness Act of 1964 (16 USC 1131-1136), except where ANILCA expressly provided otherwise. <u>Additional ANILCA guidance on wilderness management (Section 1315) and other The ANILCA provisions affecting management and use of wilderness lands are described in Titles VIII, XI, and XIII below.</u></i></p>
2	2-72			<p><u>Subsistence, Overall Effects.</u> While likely just a semantics concern, the land exchange would not</p>	<p>Clarify in the FEIS</p>

Chapter	Page	Section	Paragraph	Comment	Suggestion
				place an additional 50,737 acres under “federal subsistence management.” Rather, an additional 50,737 acres of land would be federal, and therefore open to federal subsistence users. The State of Alaska retains primary management authority for all fish and wildlife throughout Alaska, unless preempted by federal law, regardless of land ownership.	
3	3-343	3.3.10	7	The discussion seems to imply that subsistence use of off-road vehicles is limited to the managed trails in designated Wilderness. Under ANILCA Section 811, this use is allowed until restricted in accordance with 50 CFR 36.12(c).	We suggest the following revision:  <i>Former military roads that extend into Izembek Wilderness are managed as trails, and Use of off-road vehicles for subsistence access is currently allowed for local rural residents.</i>
3	3-349	3.3.10		Statements in this section imply that motorized access stops at the Izembek Wilderness boundary, such as “To reach the wilderness boundary, access the area by boat, or travel by single engine aircraft on floats or on wheels suitable for landing on a beach.”	We request the section clarify that ANILCA allows motorized modes of access within the Izembek Wilderness, which may also affect opportunities for solitude.
3	3-194	3.3.1	2	ANILCA Section 303(3) did not simply rename the Range, it “re-designated” the Range as the Izembek National Wildlife Refuge. We request the following rewrite consistent with pages 12 and 19	<i>The Range was <del>renamed</del> re-designated Izembek National Wildlife Refuge in 1980 by the Alaska National Interest Lands Conservation Act (ANILCA), Public Law 96-487, and</i>

Chapter	Page	Section	Paragraph	Comment	Suggestion
				of Chapter 1.	<i>approximately 300,000 acres of the refuge was designated as wilderness.</i>
3	3-16	3.1.3.8	1	Aleutian Seismic zone	Change to Aleutian subduction zone
3	3-16	3.1.3.8	1	The second sentence is very general and should be expanded or added to in order to make clear the potential for very large earthquakes. Leave statement from Stevens and Craw, 1994, but more recent references should be used (See comment).	Suggest adding a sentence The Aleutian subduction zone has generated multiple great earthquakes and associated tsunamis including the 1938 M8.3 Alaska Peninsula, the 1946 M7.8 Unimak, the 1957 M8.6 Fox Islands, the 1964 M9.2 Alaska, and the 1965 Rat Islands earthquakes (Davies et al., 1981; Johnson and Satake, 1994; Johnson et al., 1994; Plafker, 1969; Christensen and Beck, 1994; Beck and Christensen, 1991).
3	3-16	3.1.3.8	1	Third sentence: The Shumagin seismic gap is an outdated theory. Actually, we still don't understand how strain is being accommodated in the Shumagin gap. GPS suggests that it is accumulating a small amount of strain, but there is no record of large earthquakes in the gap.	Suggest that the authors update their reference to a more modern description of the Shumagin gap. Some current information can be found in Freymueller and Beavan, 1999, Geophysical Research Letters, vol. 26, no. 21.
3	3-16	3.1.3.8	1	Fourth sentence: "Moderate potential of flooding" should be qualified. Was there inundation related to tsunamis in 1964 or 1946? Is there potential for landslide generated tsunamis, which can be more destructive than earthquake generated tsunamis?	Suggest that the authors look for information of past tsunami inundation and report the data. Additionally, the authors should comment on the potential for landslide or volcanic edifice collapse tsunamis.
3	1	3.1.3.8	1	A figure showing the relationship of Shumagin	Consider including a figure showing the

<b>Chapter</b>	<b>Page</b>	<b>Section</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Suggestion</b>
				Seismic Gap to the Study area would be useful since it is a main focus of the geologic hazards section.	location of the Shumagin gap.
3	1	3.1.3.8	1	Statement regarding earthquakes of "significant magnitude" should be quantified.	Consider including a statement explaining what magnitude is considered to be significant in this context.
3	3-16	3.1.3.8	2	Statement "Within the Aleutian Arc, 41 of the 57 volcanoes are active" should be updated.	Replace with "The Aleutian Arc contains 52 currently active volcanoes, and many more that are dormant."
3	1	3.1.3.8	2	Significance of the number of volcanoes within specifically 30 miles of the project area is unclear. Why 30 miles, and not 40 miles or 20 miles?	If there is a specific reason for using 30 miles as a key distance from volcanoes in the context of potential hazards affecting the project area, it should be explained.

# Izembek National Wildlife Refuge Land Exchange/Road Corridor Draft EIS Review Comments

(Review period: March 19-May 18, 2012)

**Commenter: Mark Fink**

**Tribe/Agency/Organization: ADF&G**

**Branch/Division: Wildlife Conservation**

**Date: May 4, 2012**

Application of ADF&G comments to other Alternatives: We did not include specific comments on Alternative 3. Environmental Consequences identified for Alternative 2 were generally applied to Alternative 3. Consequently, our comments on Alternative 2 are applicable for Alternative 3.

Chapter	Page	Section	Paragraph	Comment	Suggestion
3	3-150	3.2.5	1	There is a typo in the last sentence where the word “quantity” is repeated twice.	Replace the first “quantity” with “quality”.
3	3-154	3.2.5	1	More recent information and references for SAP population parameters are available (see “SAP Comp 2011.doc”; Memorandum from Meghan Riley to Lem Butler): <i>The most current population estimate of 800, along with improved calf:cow ratio (46.6 calves:100 cows) and bull:cow ratio (27.9 bulls:100 cows) observed during the fall 2010 survey, demonstrates a recent improvement in calf survival and recruitment in the Southern Alaska Peninsula Caribou Herd since wolf control was initiated in 2008 (see Wolf section below) (ADF&amp;G 2010l).</i>	Suggested replacement text: <i>The most current population estimate of ≥920, along with the improved calf:cow ratio (20.0 calves:100 cows) and bull:cow ratio (40.2 bulls:100 cows) observed during the fall 2011 survey, demonstrate a recent improvement in calf survival and recruitment in the Southern Alaska Peninsula Caribou Herd following implementation of a wolf control program from 2008–2010 (see Wolf section below) (ADF&amp;G 2012x).</i>

Chapter	Page	Section	Paragraph	Comment	Suggestion
3	3-155	3.2.5	4	<p>More recent information and references for SAP population parameters are available (see “SAP Comp 2011.doc”; Memorandum from Meghan Riley to Lem Butler):</p> <p><i>A composition survey was conducted by Alaska Department of Fish and Game biologists on October 20, 2010. The herd was estimated to be comprised of 57.3 percent cows, 26.7 percent calves, and 16.0 percent bulls (ADF&amp;G 2010l). The trend from this data (in comparison to prior years) is that the proportion of calves has greatly increased since 2008 when predator control began (ADF&amp;G 2010l).</i></p>	<p>Suggested replacement text:</p> <p><i>A composition survey was conducted by Alaska Department of Fish and Game biologists on October 23, 2011. The herd was estimated to be comprised of 62.4 percent cows, 12.5 percent calves, and 25.1 percent bulls (ADF&amp;G 2012x). The trend from these data (in comparison to prior years) is that the proportion of calves has greatly increased following implementation of predator control from 2008–2010 (ADF&amp;G 2012x).</i></p>
3	3-156	3.2.5	2	<p>Update wording to differentiate between state and federal hunts (see 2011-2012 Alaska Hunting Regulations; available at <a href="http://hunt.alaska.gov">hunt.alaska.gov</a>):</p> <p><i>Although limited, the overall moose population of the local game management unit (Unit 9D) sustains a hunting season with a regulated harvest quota of 10 moose (Service 2010c).</i></p>	<p>Suggested replacement text:</p> <p><i>Although limited, the overall moose population of the local game management unit (Unit 9D) sustains a federal hunting season with a regulated harvest quota of 10 moose (Service 2010c) and a resident-only state hunting season (ADF&amp;G 2011x).</i></p>
3	3-157	3.2.5	4	<p>Rather than using a personal communication, the citation should be updated to reference the 2012 annual program report to the Board of Game (see “Annual Report to the Alaska Board of Game on Intensive Management for Caribou with Wolf Predation Control in the Southern Alaska Peninsula Caribou Herd, Subunit 9D”; available at <a href="http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.programs">http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.programs</a>):</p>	<p>Suggested replacement text:</p> <p><i>During 2008, Alaska Department of Fish and Game biologists killed 28 wolves on the calving grounds (Figure 3.2-22) from helicopters. Additional wolf control occurred in 2009 (8 wolves killed) and 2010 (2 wolves killed) (ADF&amp;G 2012x).</i></p>

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<i>During 2008, Alaska Department of Fish and Game biologists killed 28 wolves on the calving grounds (Figure 3.2-22) from helicopters. Additional wolf control occurred in 2009 (6 wolves killed) and 2010 (2 wolves killed) (Riley 2010a).</i>	
3	3-161	3.2.5	2	The qualifier “potential” is not necessary. Sealing records show that wolverines are harvested and occur throughout subunit 9D (Caribou River, David River, Joshua Green River, Cathedral River, Black Hill, Pavlof Bay, King Cove, Cold Bay), and I would contend that they certainly occur on nearby portions of the study area outside Izembek Refuge: <i>Because of their large home range and solitary nature, it is assumed that wolverines have the potential to occur on the other nearby portions of the study area.</i>	Suggested replacement text: <i>Because of their large home range and solitary nature, it is assumed that wolverines occur on the other nearby portions of the study area.</i> <b>OR</b> <i>Wolverines also occur on the other nearby portions of the study area.</i>
3	3-162	3.2.5	5	Revise dates that predator control was active: <i>Wolves occur on the State parcel. This is part of the area subject to wolf control by the Alaska Department of Fish and Game, which began in 2008, in an attempt to stabilize the caribou herd loss due to wolf predation of calves.</i>	Suggested replacement text: <i>Wolves occur on the State parcel. This is part of the area subject to wolf control implemented by the Alaska Department of Fish and Game from 2008–2010, in an attempt to stabilize the caribou herd decline due to wolf predation of calves.</i>
3	3-162	3.2.5	6	See prior comment for chapter 3, page 161, section 3.2.5, paragraph 2: <i>Wolverines are known to occur on Izembek National Wildlife Refuge (Taylor and Sowl 2008) and because of their large home range and solitary nature, it is assumed that they have the potential to occur on these nearby</i>	Suggested replacement text: <i>Wolverines are known to occur on Izembek National Wildlife Refuge (Taylor and Sowl 2008) and because of their large home range and solitary nature, it is assumed that they occur on these nearby portions of the study area.</i>

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<i>portions of the study area.</i>	<b>OR</b> <i>Wolverines are known to occur on Izembek National Wildlife Refuge (Taylor and Sowl 2008) as well as these nearby portions of the study area.</i>
3	3-163	3.2.5	2	See prior comment for chapter 3, page 161, section 3.2.5, paragraph 2.	See prior suggestion for chapter 3, page 162, Section 3.2.5, paragraph 6.
3	3-163	3.2.5	6	See prior comment for chapter 3, page 161, section 3.2.5, paragraph 2.	See prior suggestion for chapter 3, page 162, Section 3.2.5, paragraph 6.
3	3-163	3.2.5	10	See prior comment for chapter 3, page 161, section 3.2.5, paragraph 2.	See prior suggestion for chapter 3, page 162, Section 3.2.5, paragraph 6.
3	3-164	3.2.5	3	See prior comment for chapter 3, page 161, section 3.2.5, paragraph 2. Given the wide-ranging habits of wolverines and their penchant to visit shorelines in search of carrion, they seem as likely to pass through terminal sites as wolves: <i>Wolverines are known to occur on Izembek National Wildlife Refuge (Taylor and Sowl 2008) but because of their solitary nature it is unlikely that they would use or even pass through this site.</i>	Suggested replacement text: <i>Wolverines are known to occur on Izembek National Wildlife Refuge (Taylor and Sowl 2008) and may occasionally pass through this site.</i>
3	3-164	3.2.5	7	See prior comment for chapter 3, page 164, section 3.2.5, paragraph 3.	See prior suggestion for chapter 3, page 164, section 3.2.5, paragraph 3.
4	4-38	4.2.2.6	10 (stip.1)	Revise setback distance from marine mammals. (Jansen <i>et al.</i> 2010) points to harbor seal disturbance by vessels at distances up to 500 m (546 yds). The National Marine Fisheries Service (NMFS) recognizes that the current guideline of 100 yards may be inadequate and is considering possible	Suggested replacement text: “(a) not approach to within 100 yards of marine mammals in the water; Boat and motorized and non-motorized personal watercraft (PWC) traffic should remain a minimum of 500 m (546 yards) off shore when passing harbor seal haul-out areas.”

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<p>revisions. Although a NMML study focused on cruise ships, NMFS suggests 500 m (546 yards) for personal watercraft and smaller vessels since many observations note that smaller vessels--like kayak, zodiacs, etc.--often cause greater reaction in seals than larger vessels. Jansen, J.K., P.L. Boveng, S.P. Dahle, and J.L. Bengtson. 2010. Reaction of Harbor Seals to Cruise Ships. <i>Journal of Wildlife Management</i> 74(6):1186–1194; 2010; DOI: 10.2193/2008-192.</p> <p><i>“(a) not approach to within 100 yards of the marine mammal;”</i></p>	
4	4-39	4.2.2.6	5 (stip. 6)	<p>Revise setback distance from marine mammals. (Jansen <i>et al.</i> 2010) points to harbor seal disturbance by vessels at distances up to 500 m. The National Marine Fisheries Service (NMFS) recognizes that the current guideline of 100 yards may be inadequate and is considering possible revisions. Although a NMML study focused on cruise ships, NMFS suggests 500 m (546 yds) for personal watercraft and smaller vessels since many observations note that smaller vessels--like kayak, zodiacs, etc.--often cause greater reaction in seals than larger vessels.</p> <p><i>“Remain at least 100 yards away from any marine mammal that is on land, rock or ice.”</i></p>	<p>Suggested replacement text: <i>“Remain at least 100 yards away from any marine mammal that is on land, rock or ice; Boat and motorized and non-motorized personal watercraft (PWC) traffic should remain a minimum of 500 m (546 yards) off shore when passing harbor seal haul-out areas.”</i></p>
4	4-39	4.2.2.6	7	Mitigation measure A(ii) as it is not consistent	Request the removal of mitigation measure

Chapter	Page	Section	Paragraph	Comment	Suggestion
				with the goal and precludes public access to state waters. The goal of this measure is to “prevent uncontrolled vehicle access to the Izembek National Wildlife Refuge and Izembek Wilderness Area...;” however, the use of the hovercraft ramp for public boat launching will be for water access, instead of vehicle land access. In addition, the DEIS hasn’t accounted for the city costs associated with preventing public use of the boat ramp. A public launch will enable local residents to access areas of upper Cold Bay for fishing and hunting activities.	in this section and other appropriate sections of the DEIS.
4	4-48	4.2.2.7	5 (stip. 6)	See prior comment for chapter 4, page 4-38, section 4.2.2.6, paragraph 10.	See prior suggestion for chapter 4, page 4-38, section 4.2.2.6, paragraph 10.
4	4-49	4.2.2.7	1 (stip.9)	See prior comment for chapter 4, page 4-39, section 4.2.2.6, paragraph 5.	See prior suggestion for chapter 4, page 4-39, section 4.2.2.6, paragraph 5.
4	4-129	4.3.2.3	3	There is insufficient information to justify a “major” indirect effect to fish resources. While increased vehicular access could result in an increase in fish harvest, the consistent lack of ADF&G Statewide Harvest Survey site-specific estimates indicate that overall angler effort in the Cold Bay area has likely remained relatively low over time. Subsistence harvest is in managed by state and federal regulations. However, efforts are currently focused in areas with larger fish populations. ADF&G management efforts in	Suggest modifying the paragraph as follows: “Most anticipated indirect effects, such as effects to water quality and potential increased harvest pressure, would be of low intensity, long-term duration (intermittent but persistent for the life of the project), local in extent, but would impact unique resources resulting in a negligible to minor effect.”

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				the area may increase if overharvest becomes a problem. “	
4	4-131	4.3.2.3	4	Harvest may be regulated by the Alaska Board of Fisheries and the Federal Subsistence Board.	Suggested replacement text: “ <i>Additional recommended mitigation measures include appropriate adjustments of bag limits and open seasons by the Alaska Board of Fisheries and the Federal Subsistence Board for harvesting from these streams with new access, along with information, education, and enforcement strategies.</i> ”
4	4-131	4.3.2.3	6	See prior comment for chapter 4, page 4-129, section 4.3.2.3, paragraph 3.	
4	4-131	4.3.2.3	7	See prior comment for chapter 4, page 4-129, section 4.3.2.3, paragraph 3.	
4	4-138	4.3.2.4	4	While we agree that there would likely be some impact to tundra swans, the information presented in the DEIS is insufficient to support a prediction that construction of Alternative 2 would result in a major impact to tundra swans. “ <i>Construction of Alternative 2 would result in major direct and indirect effects to Tundra Swans and moderate effects to other breeding birds.</i> ”	Recommend including data on the average number of breeding pairs historically found in the project area (both from the resident population in Izembek National Wildlife Refuge and non-resident migrants), and estimates of the local swan population and number of non-resident swans migrating through the refuge to be used in predicting potential adverse direct and indirect effects to Tundra swans. In addition, we recommend including information describing whether swan nesting habitat is limited in the refuge.
4	4-140	4.3.2.4	4	See prior comment for chapter 4, page 4-138 section 4.3.2.4, paragraph 4. “ <i>For Tundra Swans, implementation of Alternative 2 would result in major direct and indirect effect.</i> ”	
4	4-145	4.3.2.4	2	While we agree that there would likely be	Recommend including information on the

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<p>some impact to brant and emperor geese, the information presented in the DEIS is insufficient to support a prediction that operation and maintenance of Alternative 2 would result in a major direct and indirect effects to brant and emperor geese. The DEIS indicates that a ½ -mile buffer is necessary to minimize disturbance to waterfowl using intertidal areas. While there may be increased hunting or other human activity from improved access, there is little information suggesting such an increase would result in a major effect.</p> <p><i>“Operation and maintenance of Alternative 2 would result in major (Brant and Emperor Goose) and moderate (other species) direct and indirect effects to these resources.”</i></p>	<p>number of hunters and other users expected to access Kinzarof Lagoon from the road to be used in predicting potential adverse indirect impacts to brant and emperor geese. In addition, any information on disturbance to brant and Emperor geese from operations and maintenance on existing roads adjacent to Izembek Lagoon may be useful in predicting potential adverse effects.</p>
4	4-146	4.3.2.4	3	<p>See prior comment for chapter 4, page 4-145 section 4.3.2.4, paragraph 2.</p> <p><i>“The summary impact of Alternative 2 on Brant, Emperor Geese, and other migrating/wintering birds is considered major (Brant and Emperor Goose) to moderate (other species).”</i></p>	
4	4-153	4.3.2.5	3	<p>As the proposed road corridor is far removed from caribou calving grounds, mention of disturbance during calving is not germane to this discussion:</p> <p><i>Repeated disturbance by humans on foot during calving greatly increases the risk of calf abandonment and/or physical injury. Additionally, repeated disturbance results in adult caribou moving farther and remaining</i></p>	<p>Suggested replacement text:  <i>Repeated disturbance by humans on foot results in adult caribou moving farther and remaining away longer from the point of disturbance.</i></p>

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<i>away longer from the point of disturbance.</i>	
4	4-153	4.3.2.5	4	As the proposed road corridor is far removed from caribou calving grounds, mention of disturbance during calving is not germane to this discussion: <i>The combination of noise and human disturbance, e.g., all-terrain vehicle traffic, during the calving period could have significant impact and displace caribou from the road alignments.</i>	Suggested replacement text: <i>The combination of noise and human disturbance, e.g., all-terrain vehicle traffic, could have significant impact and displace caribou from the road alignments.</i>
4	4-154	4.3.2.5	2	Typo: • <i>degree of visual obstruction – caribou are reluctant to cross when they cannot(see the other side</i>	Suggested replacement text: • <i>degree of visual obstruction – caribou are reluctant to cross when they cannot see the other side</i>
4	4-156	4.3.2.5	4	Current wolf hunting and trapping effort is very low in the project area (average of 3 wolves harvested/year over the past 20 years in all of subunit 9D – an area covering 3,325 mi <sup>2</sup> ), making the qualifier “relatively” superfluous: <i>Currently, the Alaska Department of Fish and Game reports that relatively little wolf hunting occurs in the project area.</i>	Suggested replacement text: <i>Currently, the Alaska Department of Fish and Game reports that little wolf hunting occurs in the project area.</i>
4	4-157	4.3.2.5	6	Correct number of wolves removed in 2009: <i>For example, the Joshua Green River region was established as a Controlled Use Area in 1993 to protect brown bears, and the Alaska Department of Fish and Game killed 28 wolves on caribou calving grounds adjacent to the refuge in 2008, 6 wolves in 2009, and 2 in 2010 to protect caribou.</i>	Suggested replacement text: <i>For example, the Joshua Green River region was established as a Controlled Use Area in 1993 to protect brown bears, and the Alaska Department of Fish and Game killed 28 wolves on caribou calving grounds adjacent to the refuge in 2008, 8 wolves in 2009, and 2 in 2010 to improve caribou calf survival and recruitment.</i>
4	4-158	4.3.2.5	4	Change sentence to reflect the fact that two	Suggested replacement text:

Chapter	Page	Section	Paragraph	Comment	Suggestion
				types of barriers are being considered, only one of which involves a chain barrier: <i>However, if off-road vehicle access from the road is not effectively limited by the chain barrier, then human impacts can spread to a much greater area.</i>	<i>However, if off-road vehicle access from the road is not effectively limited by the barrier, then human impacts can spread to a much greater area without additional management and enforcement of existing ORV regulations.</i>
4	4-164	4.3.2.6	3	Some disturbance effects from the operation and maintenance of the road are possible. Harbor seals using Kinzarof Lagoon might be able to hear road traffic along the isthmus part of the road at its nearest points to Kinzarof Lagoon. Previous survey information suggests that the haul out is likely used for pupping. Studies on harbor seal haulout areas have shown animals use the same areas for critical resting periods year round as are used for pupping (May-June) and molting activities(August-September). <i>“Harbor seals would not be disturbed or displaced by such noise, unless they were pupping or nursing in that area.”</i>	
4	4-164	4.3.2.6	5	Change sentence to reflect the assumption of pups in the area. <i>“The new road could provide increased access for waterfowl hunting. Hunters shooting toward marine habitat could potentially disturb adult harbor seals.”</i>	Suggested replacement text: <i>“The new road could provide increased access for waterfowl hunting. Hunters shooting toward marine habitat could potentially disturb harbor seals.”</i>
4	4-176	4.3.3.1	3	Sitkinak Island parcels transferred to the State would need to be free of contamination and would be managed under the Kodiak Area Plan. This plan could be amended to address management changes needed to protect newly	Suggested replacement text: <i>“Under the exchange effected by Alternative 2, these lands would be transferred to the State of Alaska for management under the Kodiak Area Plan,</i>

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<p>acquired harbor seal habitat.</p> <p><i>“Under the exchange effected by Alternative 2, these lands would be transferred to the State of Alaska for management under the Kodiak Area Plan. The parcels on the main island would be classified as Grazing and Settlement. The spit would likely be classified as General Use.”</i></p>	<p><i>including any plan amendments. The parcels on the main island would be classified as Grazing and Settlement. The spit would likely be classified as General Use or Wildlife Habitat.”</i></p>
4	4-203	4.3.3.7	4	<p>Off-road vehicles are currently allowed for subsistence uses in the Izembek Wilderness area surrounding the proposed road corridor. Closure of this area to ORVs for subsistence purposes, by future federal regulation, could be considered a negative effect on access to subsistence resources, even though there would be improved access for street vehicles.</p> <p><i>“The operation of the southern road alignment under Alternative 2 would not restrict access to subsistence resources, but instead would result in minor improvements in access to subsistence waterfowl and salmon resources near Kinzarof Lagoon...”</i></p>	<p>Recommended replacement text:</p> <p><i>“Although the off-road use of ORVs for subsistence in the wilderness area would likely be restricted through future federal regulation, the operation of the southern road alignment under Alternative 2 would result in minor improvements in access to subsistence waterfowl and salmon resources near Kinzarof Lagoon...”</i></p>
4	4-365	4.6.2.6	4	<p>This section does not address potential effects to harbor seals during pupping.</p> <p><i>“Noise generated from construction activities at the Cold Bay dock could elicit behavioral responses from harbor seals, killer whales, harbor porpoise, or gray whales near the dock. Construction would require driving 180 spin-fin piles into the seafloor alongside the existing dock. Noise from pile driving</i></p>	<p>We recommend a mitigation measure that would require surveys to determine whether pupping occurs in haul outs near the Cold Bay dock, including Kinzarof Lagoon (Appendix F, Mitigation Measures, Marine Mammal Protection Plan). Measures to minimize disturbance to harbor seals during the critical pupping season (early May through early July)</p>

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<i>activities may mask marine mammal vocalizations or cause deflection or avoidance of an area (David 2006; Tougaard et al. 2009; Würsig et al. 2000). The 2003 EIS acknowledged the potential for noise disturbance and assumed that pile driving would be suspended overnight to avoid unnecessary disturbance to nearby residences in the City of Cold Bay. Noise would likely result in some level of temporary displacement or avoidance of the area by harbor seals, killer whales, harbor porpoise, and gray whales during pile driving activities.”</i>	should be developed if construction noise is likely to affect harbor seal pupping.
App. F	F-4	A.	(vi)	The Alaska Department of Fish and Game issues Fish Habitat Permits. <i>“Water withdrawals from a fish bearing stream will be done in accord with a habitat permit form the State of Alaska.”</i>	Recommended replacement text: <i>“Water withdrawals from a fish bearing stream will done in accordance with a Fish Habitat Permit issued by the Alaska Department of Fish and Game.”</i>
App. F	F-6	A.	(ii)	The mitigation measure is not consistent with the goal and precludes public access to state waters. The goal of this measure is to <i>“prevent uncontrolled vehicle access to the Izembek National Wildlife Refuge and Izembek Wilderness Area...;”</i> however, the use of the hovercraft ramp for public boat launching will be for water access, instead of vehicle land access. In addition, the DEIS hasn’t accounted for the city costs associated	Request the removal of mitigation measure.

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<p>with preventing public use of the boat ramp. A public launch will enable local residents to access areas of upper Cold Bay for fishing and hunting activities.</p> <p><i>“The applicant shall prohibit use of the hovercraft ramp for public boat launching or retrieval (Alternatives 1,4, and 5).”</i></p>	
App. F	F-6	A.	(iii)	<p>The DEIS clearly recognizes that OHVs are allowed for subsistence uses, under Section 811 of ANILCA; however, the signing measure doesn’t recognize this use. The DEIS does not clearly identify an intent by the Service to close the Wilderness lands adjacent to the road corridor through regulation.</p>	<p>Recommended replacement text:</p> <p><i>“The applicant shall place signs along the road advising the public that no motorized vehicles are allowed to access the Izembek National Wildlife Refuge or Izembek Wilderness lands from the newly constructed road corridor. The applicant and Service will also jointly coordinate development and installation of signs at appropriate locations where notice to the public will be given that only motorized vehicles allowed for subsistence purposes may access the Izembek National Wildlife Refuge and Izembek Wilderness lands, unless subsequently prohibited by future federal regulation. The applicant shall be responsible for the cost of signs installed within the road right-of-way (Alternative 2 and 3).”</i></p>

## Izembek National Wildlife Refuge Land Exchange/Road Corridor Draft EIS Review Comments

(Review period: March 19-May 18, 2012)

**Commenter: Bill Ballard, Special Projects Coordinator**

**Tribe/Agency/Organization: Department of Transportation and Public Facilities (DOT&PF)**

**Branch/Division: Statewide Design and Engineering Services**

**Date: May 14, 2012**

Overarching Comment: The *Omnibus Public Land Management Act of 2009* (the Act) requires: 1) an EIS evaluate the potential construction and operation of a road between the communities of King Cove and Cold Bay, Alaska; 2) the transfer of Federal lands be the minimum acreage of Federal land that is required for the construction of the road corridor and 3) the applicable design standards of the State be used to develop the road.

The Department of Transportation and Public Facilities (DOT&PF) and the Federal Highway Administration, Western Federal Lands, Highway Division (WFLHD) identified the American Association of State Highway and Transportation Officials, *Guidelines for Geometric Design of Very Low-Volume Local Road (AASHTO 2001, 2004)* and the DOT&PF *Alaska Highway Preconstruction Manual (Effective January 1, 2005)* as the applicable design standards.

The Fish and Wildlife Service (Service) used a “35 percent design level” (DEIS, pg. 2-27) to develop the two road corridor alternatives. In addition, the last sentence in paragraph 5 of the DEIS states, “Consistent with this level of design, a centerline survey, geotechnical investigations, or other detailed site surveys have not been completed.” The DOT&PF Preconstruction Manual does not describe a 35 percent design. However, the Preconstruction Manual’s description of a reconnaissance study (Chapter 430.3) provides a comparable level of design. A reconnaissance study is used to identify the problem, describe technically feasible alternatives prior to the initiation of an EIS or environmental assessment. It is a qualitative analysis comparing alternatives using factors like alignment, grade, width, length, cost, soils, drainage, constructability, maintenance, right-of-way, wetlands, historic and cultural sites and other environmental indicators.

Although Alternatives 2 and 3 have been developed in sufficient engineering detail to compare the design characteristics, environmental impacts and costs, there is not enough detail to determine the minimum corridor width necessary to construct and operate a single lane two-way gravel road. We remain concerned that the 100-foot corridor width proposed by the Service will not be adequate for the entire corridor. The plans sheets in Appendix E (Water Sources and 35 Percent Road Design) have multiple locations where embankment fills and cuts extend near the 100-foot right-of-way limits. It is difficult to discern cut slope angle at these

locations, but if steeper slopes are being used to stay within the 100-foot corridor as indicated in previous plans (e.g. 2:1 cut slopes) there could be slope stability problems.

There is little discussion in the DEIS regarding the disposal of unusable excavation. DEIS Table 2.4-2 shows 0.3 and 2.4 acres of uplands reclaimed with excavated material in Alternatives 2 and 3 respectively. It is likely that both Alternatives 2 and 3 would generate a large volume of unusable material since much of the area could have a thick layer of organics and/or volcanic ash at or near the surface. It is also possible that because of the local climate, excavated material would be too wet to compact and that drying would not be feasible. Therefore, the FEIS should have an expanded discussion of construction sequencing and methodology for each alternative. This should include an analysis of the roadbed width necessary for construction truck traffic. Material sources (especially side borrow production) should also be discussed.

The DEIS states in several locations (e.g. Chapter 1.5 Scope of Analysis and Decisions to be Made) that the EIS can be used by other agencies' regulatory and permit decisions, such as the Federal Highway Administration (FHWA) and the U.S. Army Corps of Engineers (Corps). The DEIS may not fulfill this intent, particularly with regard to the Corps. The DEIS says, "The Corps' role as a cooperating agency is to ensure that the EIS process considers the Corps' requirements under NEPA and the Section 404(B)(1) Guidelines.(pg. 1-10)" It also states, "[T]he Corps would evaluate the proposal and determine if the proposed action is the least environmentally damaging practicable alternative,...(pg. 1-11)". It is our opinion that the DEIS has not adequately evaluated the potential impacts to wetlands in sufficient detail for the Corps to determine a Least Environmentally Damaging Practicable Alternative (LEDPA). The wetlands have not been evaluated in sufficient detail for the Service to meet its obligation under Executive Order 11990, Protection of Wetlands, particularly by the deferring mitigation to the DF&G and Corps permits (pg. 4-125).

Many of the environmental effects presented in the PDEIS were increased in the DEIS without corresponding documentation. This is disconcerting. Chapter 2.8 (Comparison of Alternatives) defines impact indicators as Negligible, Minor, Moderate and Major. We believe that these indicators as described on page 2-51 can too easily default to a "major" effect not supported by the data. The designations can also be arbitrarily assigned. For example, in Table 2.8-1 (Impact Summary by Alternative) under air quality all five alternatives read: "The total estimated annual emissions would consist of small emission sources operating intermittently, and spread out over a relatively large area." Alternatives 1 and 4 are considered to have "negligible" impact, however Alternatives 2,3 and 5 are considered "minor."

Page 1-11 says that should the Secretary determine the proposed land exchange and road is in the public interest the alignment and design of the road would be refined and land conveyances executed. The FEIS should clearly explain this process.

Finally, comments in the table below identified for Alternative 2 in Chapter 2 are applied to Alternative 3 as well and comments identified for Alternative 2 in Chapter 4 should be generally applied to Alternative 3.

Alt	Page	Section	Par.	Comment	Suggestion
1	1-11	Project relationship to Laws, Regulations, Polices and Required Permits	p1:s3	Delete: “The State of Alaska would proceed to permit applications, reviews and decisions on the proposed road.”	Replace with: The Department of Transportation and Public Facilities (DOT&PF) in cooperation with the Federal Highway Administration will begin design development of the proposed road in accordance with Title 23 Highways.  This includes all applicable NEPA and other environmental approvals and permits necessary for construction of the road.
1	1.6.1	Federal, Laws, Regulations and Policies	s2	If the Secretary of Interior finds the land transfer in the public interest, the State through DOT&PF would construct the road with Federal-aid Highway funds. These would be funds through the “Community Transportation Program” and have been included in the 2012-2015 Alaska Statewide Transportation Improvement Program (Need ID 26120)	Suggested sentence: “Next the framework laws for the Corps (a cooperating agency) and FHWA (a cooperating agency) is described.”
1	1-24	1.6.4 Responsibility for Obtaining Permits	p1:s2	Should the Secretary of Interior authorize the land exchange the State of Alaska, DOT&PF would be responsible for the design, construction and operation of the road. However, should the Secretary not approve the land exchange it is unknown who would be responsible for implementing other action alternative, i.e. Alternatives 4 or 5 since neither has a “proponent.” Selection of Alternative 4 or 5 would effectively be selecting “No Action”.  Suggested Language: “Should the Secretary of Interior authorize the land exchange the State of Alaska, DOT&PF would be responsible for obtaining all applicable federal, state and local permits for construction of the road.”	Suggested first sentence: “Should the Secretary of Interior authorize the land exchange the State of Alaska, DOT&PF would be responsible for obtaining all applicable federal, state and local permits for construction of the road.”
1	1-24	Major Federal Permits and Authorizations		Add bullet: FHWA will need to issue an independent Record of Decision (ROD) before federal-aid funds could be expended for construction of a road per 23 U.S.C. Highways.	

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
2		Alternatives 2 & 3	General Comment	<p>Without either a detail description of the engineering analysis or a design report as an appendix, reviewers are not able to understand the design factors and engineering thought process that went into establishing the centerline location and other design elements.</p> <p>This is critical information that is necessary in determining the best road location and establishing the minimum corridor width necessary for a road.</p>	
2		Alternative 2 & 3	General Comment	<p>The ability for construction trucks to safely pass without stopping will be a constructability issue that affects both the duration and cost while building the subgrade and placement of surfacing material.</p> <p>The contractor could not use large capacity construction vehicles that haul 20 cubic yard loads because they could not pass safely on the proposed subgrade width. The ability to use large capacity haul equipment would provide efficiency, economy of scale and reduce construction time.</p> <p>The use of standard highway end dumps with trailers or longer belly dumps can deliver equivalent loads to the articulated trucks but would be impracticable because of restricted turnaround and backing-up constraints.</p> <p>Common off road trucks have an operating width of approximately 12 feet. The proposed finished subgrade surface is 21 feet, which would not be adequate for larger haul vehicle to pass safely.</p>	Recommend an increase in subgrade width of two to three feet, which would enable these larger off road trucks to pass safely. This would increase the increase the foot print slightly but would reduce construction time and disturbance to wildlife.
2	2-28	Design Criteria		<p>AASHTO – low volume local roads guide suggests that the “design speed should realistically represent actual and anticipated operating speeds”.</p> <p>A 20 MPH design speed may not be too slow for this road given several factors such a sight distance, terrain and low traffic volumes.</p>	Suggest that the design speed of the Outer Marker and/or Outpost Road be used.
2-				A 100-foot wide corridor may not accommodate this road design within rolling terrain.	The Final EIS should make provisions for a wider corridor where topography requires it or provide sufficient engineering analysis to identify locations where a wider corridor will be necessary.

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
2		P-P Sheet		Larger horizontal and vertical curves will likely “catch” outside the 100-foot corridor in some location.	Either widen the entire corridor or identify those areas where the road embankment would exceed 100-foot.
2	2-29	Typical section		Typical – structural section is not sufficient for building a road over virgin terrain with soft soils, drainage structures, and possible permafrost.	Minimum 5-foot embankment.
2	2-29	Typical section		1.5:1 side slopes is really steep and will likely result erosion and instabilities within the road.	Flatten slopes to a minimum of 3:1.
2	2-29	Typical section		6 inches of surface course should be increased to ensure stability	Surface course should be increased to ensure long-term stability within the structural section.
2	2-28			900-foot separation between turnouts is excessive especially during conditions of low light and poor visibility.	Recommend turnouts be located every 500-foot except in those location where terrain or environmental factors dictate a longer distance.
2	2-29	Typical section		The combination of wind, water and snow will be a major issue in determining the roadside ditch design. The shallow ditches V-ditch proposed will be problematic. A minimum four-foot flat bottom ditch would be more appropriate for these conditions.	Recommend a minimum four-foot flat bottom ditch. At a minimum the depth of the roadside ditches should be increased.
2	2-28			Substantial drainage structures will be required on this project. Minimum, 24-inch culverts would result in only 1-foot of coverage. This will likely result in differential settlement and “speed bumps”.	Recommend the structure section be increased.
2	2-28			No soils investigation was conducted as part of this engineering. This should be a major concern for the stakeholders, given the restrictive nature of the narrow corridor, steep grade and slopes, major horizontal curves, drainage structures (culverts and bridges), water bodies and soft erodible soils.	Recommend a field investigation along both road corridors with soil probes as necessary to assist in the preliminary engineering analysis.
2	2-31			Only one material site has been identified for use. This is unrealistic given the length and volume of material required for this project	

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
2	2-31			<p>Material site – No information was presented on the type and quantity of material available at this site.</p> <p>Upon completion of the current construction project to the NeCorner most useable material will be exhausted.</p> <p>The Final EIS will need to take into consideration disposal of unusable material. The rolling terrain of the central alignment (Alt 3) would likely generate large quantities of unusable material associated deeper excavation and the likelihood of encountering volcanic ash. The amount of material cannot be quantified without a detailed geotechnical investigation. If this material cannot be disposed within the road corridor off-site disposal would be a significant cost.</p>	
2	2-31			<p>Material Site – 6.2acres is too small for the volume of material required on this project. A material site(s) in excess of 20 acres could be needed to provide the embankment fill necessary for the road. Surface course material would likely have to be barged to the project.</p>	
2	2-31			<p>No material disposal sites were identified. Is it assumed that all organic material will be place on slopes? It is likely there will be a substantial amount of overburden to deal with. If placed on slopes, the result in even shallower ditches.</p>	
2	2-28			<p>It states that the “cut and fills have balanced”. With no geotech information available, how was the overburden thickness addressed?</p>	<p>We encourage the Service to conduct a reconnaissance level field investigation of the two- alignments.</p>
2	2-26	Typical		<p>Bollards – installation as shown may not work due to soft soils and frost jacking. As a result the bollards and chain may not keep ATVs out of the Wilderness.</p>	<p>Consider other solutions such as periodic signage and only use bollards where Refuge staff feels it absolutely critical.</p>
2	2-32			<p>Temporary Barge landings - .5 acre is very small considering the type of equipment and resources that are involved in project of this size.</p>	<p>2- acre minimum or clarify</p>

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
2	2-32			It is unlikely that staff housing would be located in King Cove. The contractor would likely establish a remote camp in the vicinity of the NeCorner Hovercraft facility or adjacent King Cove Corporation lands.  Contractors routinely establish field camps when working in rural Alaska.	
2	2-32			Annual M&O cost for 20 miles of road would likely be approximately \$200,000.	
2			Road Const.	Construction of such a narrow road way will be difficult at best. Turning around, backing up and passing of large equipment will be virtually impossible. The cost associated with the construction inefficiencies will be substantial. Increasing the roadway, available material sites and the number of turnouts would help	
	2-27			Barrier of any type along roadway could significantly increase long-term maintenance costs. Recommend installing signs along roadway and installing the barrier at locations deemed to be problematic.	
	2-27 & 2-36	Design		The proposed roadway (width & height) should allow for adequate cover for minimum culvert size of 24 inches all culverts.	
	2-29			Recommend at least 9 inch E-1 base course.  Ditch depths need to be at least 2-feet; this includes the 1-foot riprap ditch lining.	
1	1-3	1.2	last paragraph page 1-3, last sentence	Sentence reads “Upon issuance of a Construction permit...” Is this referring to a specific Construction permit? If so I would mention which permit is being referenced.	

Alt	Page	Section	Par.	Comment	Suggestion
2	2-23	Table 2.4-2		<ul style="list-style-type: none"> <li>Repeat comment: Should address temporary construction impacts which will likely result in wider corridor in mountainous areas</li> <li>If the road width is estimated to the tenth of a foot from a concept design, there should be a disclaimer somewhere that states that the final design width will vary based on more detailed topographic and geotechnical information.</li> </ul>	
2	2-29	2.4.2	Cross section	<p>There are two issues with the 1.5:1 slope:</p> <ul style="list-style-type: none"> <li>To assume a 1.5:1 is a steep slope in a preliminary cross section before a geotechnical study is performed. Except in area of rock, it will be very difficult to prevent erosion both during construction and operations.</li> <li>The 4:1 recoverable slope does not extend far enough from the travelled way. AASHTO suggests 7-foot to 10-foot as the middle of the range.</li> </ul>	
2	2-33	2.4.2	Operations and Maintenance	Is the stockpile quantity important? The presumption that 10,000cy will be stockpiled during the construction phase. This would be contingent on several factors such as the funding, area for stockpile, storm water runoff concerns and wind erosion concerns.	Recommend that this reference be deleted
2	2-38	2.4.3	Design Criteria, p3	Although AASHTO low volume road guidelines allow for grades up to 12 percent. This is not advisable for either road alternative with the winter weather conditions across the isthmus.	
2	2-38	2.4.3	Last	DOT&PF would be the “project applicant”.	
2	2-38	2.4.3	First	Repeat comment: Delete reference to stockpile during construction for maintenance	
2	various	2.8	Tables	Repeat comment: Either stop referencing specific quantities, or qualify them as preliminary	

Alt	Page	Section	Par.	Comment	Suggestion
2	Alt 5			There is no mention of who will operate the displacement hull ferry. There is no intent for the Alaska Marine Highway System (AMHS) to operate this ferry. However, depending on who would operate the ferry, the costs would be significantly different (i.e. union versus non-union, government versus private, etc.)	
2	Alt 5	2.4.5		<p>It is not clear how the cost estimates for Alternative 5 was developed nor the operating parameters and assumptions. There are a lot of factors that must be considered when operating a six-days-per-week ferry service between Lenard Harbor and Cold Bay.</p> <p>If this were an AMHS service it would likely require two crews in order to provide the level of service proposed and be available for 24x7 emergency medical operations (Medvacs). The crew would need to reside in King Cove and if the permanent crew could actually live in King Cove that would be the least expensive option. However, there is no guarantee that will be the case. For example the entire crew of the AMHS vessel Chenga in Cordova resides in other communities and must commute to Cordova for their shift. This is a significant cost.</p> <p>The EIS should give some indication of the ferry schedule and how it would align with flight schedules into the Cold Bay Airport. The EIS should evaluate whether multiple trips per day between Lenard Harbor and Cold Bay during peak travel periods is practicable. The public expectation could quickly become an expectation that the ferry will meet and serve all flights.</p>	
2	2-47			The assumption that the ferry will be out of service for seven days every two years is unrealistic. The estimate needs to assume transit time to a dry-dock of adequate size to accommodate the ferry.	

Alt	Page	Section	Par.	Comment	Suggestion
2	2-79		p1	<p>We believe that the approach to delineate wetlands, evaluate and compare those wetlands within the proposed road corridors is inadequate without field verification of the data is flawed. The USACE has requested a field delineation of wetlands to verify the office delineation; the Service chose not to conduct the field delineation.</p> <p>The following statement from the DEIS is confusing and we assume it is meant to justify not conducting a field review of the wetlands within the proposed road corridors.</p> <p>The DEIS says, “But through the recognition of the important characteristics of the wetlands within the proposed corridors, such as proximity to Izembek and Kinzarof lagoons (which experience intensive use by numerous species of waterfowl, water birds and other wildlife), a mix of open water habitats, physical location in relationship to essential fish habitat, and designation as a Wetland of International Importance, a narrative comparison of the wetlands values within other parcels could be made.”</p> <p>It is our position that this statement justifies the need for a field review. Although the wetlands within between the Izembek and Kinzarof lagoons are important it cannot be concluded that all of the wetlands in particular wetlands directly or indirectly affected by the alternatives have the same habitat value. Even if they have the same “vegetative signature” when viewed at the office.</p> <p>We believe that wetlands will be a key impact category in the Secretary’s decision; therefore, we believe the FEIS should include a field verification of the data presented in the DEIS.</p>	

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
2	2-81	Cultural Resources		Conducting an on-site inventory prior to any groundbreaking activity as proposed in the DEIS is inadequate and does not give the Secretary the information necessary to make an informed decision. Nor do we believe this approach meets the Service's National Historic Preservation Act (NHPA) Section 106 obligations.	We recommend an archaeologist and or historian walk both road corridors to identify the presence WWII activity or sites within each road corridor.  The FEIS should document compliance with Section 106 of the NHPA. The area of potential effect (APE) should be identified on a figure and the Service's rationale for the APE should be documented along with the results of consultation with the State Historic Preservation Officer (SHPO), affected Tribes and other consulting parties (e.g. DOT&PF, AEB and possibly WFLHD) and the results of any field investigation
3	Figure 3.2-2		3-49	Figure is titled "Original Proposed Wetlands of International Importance".  Is that the official boundary? If so, the figure should be title "Wetlands of International Importance" otherwise only show the Ramsar wetland boundary.	
3	wetlands			A figure illustrating the watershed boundary between Izembek and Kinzarof lagoons would assist in evaluating direct and indirect effects to the watersheds.	
3	wetlands		General comment	To better assess the effects of the roads alternative on Izembek Lagoon and Kinzarof Lagoon permanent and perennial streams should be mapped for the Final EIS	
3	wetlands		Table 3.2-6	Giving the wetlands totals at 0.1 acre implies a level of accuracy that can't be achieved with the data used for the analysis.	Suggest that the wetlands acreages be rounded off no less than to the nearest acre unless the wetlands data is verified in the field.
3	3-47	3.2.2.2	Wetlands of International Importance	The Ramsar boundary needs to be clearly delineated and described. There should be no discrepancy in the Ramsar boundary. This needs to be clarified in the FEIS.	The Service should resolve the boundary discrepancy so it can be accurately described in the FEIS.

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
3	3-48		last	The write-up describing the area of Wetlands of International Importance (WII), i.e. Ramsar, is confusing. This is important information that needs to be clarified. In particular Figure 3.2-2 adds to the confusion since it shows the boundary submitted with the original application not the official boundary as it is described in the text.	Suggest Figure 3.2-2 be modified to show the Ramsar area using the Izembek State Game Refuge boundary.  Suggested wording: The Izembek National Wildlife Refuge, including the Izembek State Game Refuge as shown in Figure 3.2-2, is one of 19 sites in the U.S. designated as “Wetlands of International Importance” under a multi-national environmental agreement known as the Ramsar Convention (Ramsar).
3	3-103	Anadromous Waters		Suggest this section be titled “Anadromous Fish Waters”.	
3	3-103	Anadromous Waters		Only those anadromous fish streams listed in the DF&G Catalog of Waters Important for the Spawning, Rearing or Migration of Anadromous Fishes are designated as Essential Fish Habitat (EFH). This can include contiguous wetlands, i.e. those hydrologically connected to the stream.	
3	3-202	3.3.1.2 Land management	Federal Aviation Administration	The last sentence says that the FAA has primary management authority for the land and the Service has secondary management authority.  Under the land exchange will the Service no longer have a secondary management authority of FAA lands acquired for a road? This needs to be clarified in the text.	
4	4-2	4.1.2		As stated previously, there are several areas where additional data would be helpful or essential to the Secretary’s decision. We believe it is incumbent upon the Service to obtain the data necessary for an informed decision. Particularly any impact category considered to results in a major adverse impact.	Recommend the Service meet with the cooperating agencies as soon as possible to discuss incomplete information and how best to obtain additional or missing data.

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
4	4-122	4.3.2.2	Wetlands	<p>General Comment: This section is one of the more significant sections in Chapter 4. Unfortunately it is poorly written, which makes it difficult to understand and confusing.</p> <p>Numeric information, particularly as presented in the second sentence of paragraph two, would be easier to follow by having it in a table.</p>	This section should be rewritten for clarity in the FEIS.
4	4-122	4.3.2.2	P3	<p>The sentence says that there would be approximately 162 drainage structures installed, 154 of these being “cross drainage culverts.” It is not clear if the cross drainage culverts are necessary for road runoff, perennial streams crossing or both. As written it seems to imply that the road would cross approximately 154 small drainages.</p> <p>The fourth sentence says, “Cross drainage culverts will be placed in uplands areas to maintain the existing localized drainage patterns.</p> <p>Are the 154 cross drainage culverts referenced in the 1<sup>st</sup> sentence the same cross drain culverts reference in the 3<sup>rd</sup> sentence that will be place in uplands to maintain existing drainage patterns?</p>	Only those cross drainage structures being placed in wetlands (jurisdictional and non-jurisdictional) should be discussed in this section. Cross drainage culverts used in uplands to maintain existing localized drainage patterns should be discussed in Section 4.3.1.4 Hydrology/Hydrologic Processes
4	4-122	4.3.2.2	Last paragraph	<p>The DEIS states, “Indirect effects would result from modification to the hydrology of adjacent wetlands because road fill would disrupt surface flows causing some ponding upslope and dewatering downslope, resulting in a change in wetland functional capacity.”</p> <p>This is not supported by previous statements in the DEIS, such as, “Cross drainage structures would be placed in uplands areas at appropriate locations to maintain the existing localized drainage patterns.”</p>	

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
4	4-123	4.3.2.2	p3	<p>Is there any documentation that would indicate that selection of Alternatives 2 or 3 would effect the status of the Wetlands of International Importance designation?</p> <p>According to Figure 3.2-2, Original Proposed Wetlands of International Importance, only a portion of Alternative 2 and 3 are within the Ramsar designation. However, the text says that both corridors are entirely within the entire Izembek Refuge and Izembek State Game Refuge.</p> <p>The text and figure need to be consistent.</p>	<p>The Ramsar boundary needs to be clearly shown on a figure. Suggest that the State Game Refuge boundary be used to illustrate the Ramsar boundary because it encompasses the eelgrass beds.</p>
4	4-124	4.3.2.2	Summary	<p>The narrative discussing the direct and indirect effect from construction on wetlands (4-122 to 4-124) does not seem supported by the data. The loss of approximately 4 acres of lowland wet low scrub/shrub and lowland wet sedge and approximate one acre of beach system would seem to be near negligible when compared to the over 4,000 to 5,000 Kinzarof marsh system.</p>	

Alt	Page	Section	Par.	Comment	Suggestion
4	4-124	4.3.2.2	Summary Last sentence	<p>The sentence states, “[T]he Service would report to the Ramsar Convention the resulting changes to the ecological character of these listed wetlands.”</p> <p>However, the DEIS does not address some of the points raised by the U.S. National Ramsar Committee scoping comments dated (Suzanne Pittenger-Slear Chair, U.S. National Ramsar Chair to Helen Clough, Project), September 29, 2009.</p> <p>Three key points raised in the U.S. Ramsar Committee letter that we believe have are not addressed in the DEIS are: 1) would the 206 acre land exchange effect the Ramsar boundary; 2) would the land exchange and road change be consistent with the fundamental pillar of the Ramsar Convention and 3) would the land exchange and road effect the Ramsar boundary or effect the ecological character such the USFWS would delisted the site.</p> <p>Although approximately 206 acres would be removed from the Refuge, it would still be within the Izembek State Game Refuge. Therefore, the land would still be within the Ramsar boundary.</p> <p>We believe that any adverse impact resulting from the road would not alter the ecological character of the Izembek Lagoon and Kinzarof Lagoon area sufficient that it would no longer meet the “fundamental pillar” of the Ramsar Convention.</p> <p>We believe the proposed land exchange to enable a low volume single lane gravel road connecting the residents of City of King with the Cold Bay can be accomplished with integration of appropriate mitigation measures while maintaining the valuable ecological character of the site.</p>	

Alt	Page	Section	Par.	Comment	Suggestion
4	4-124	4.3.2.2	Direct Effects and Indirect Effects from Operation and Maintenance	<p>The proposed area receives significant rainfall so road dust should not be an issue. Using data from the Denali Highway to assess the potential dust impacts on wetland vegetation is inappropriate. This is an interior Alaska highway that receives limited rain. However, the narrative presented states that roadside dust should have a negligible effect on wetland vegetation.</p> <p>A moderate intensity impact resulting from dust seems excessive in this location and environment unless the Service can document that wetlands vegetation adjacent to Outer Marker Road or Out Post Road have been permanently impact by vehicular dust.</p>	
4	4-125	4.3.2.2	Summary Sentence 1 and last sentence	<p>States that there would be an indirect effect from operation and maintenance on plant communities resulting from dust. This is not supported by the analysis, as stated above; the effect on plant communities from dust should be negligible.</p> <p>Rating the effect of operation and management of the road on the wetlands at moderate seems excessive based on the impact analysis and the preceding narrative.</p>	Suggest the Service reconsider the moderate rating.
4	4-125	4.3.2.2	Mitigation Measures Last sentence	<p>Deferring the Service's Executive Order 11990, Protection of Wetlands, mitigation responsibilities to the Corps and FDF&amp;G is inappropriate and inconsistent with the Service's EO responsibility.</p>	The Final EIS should include an appropriate mitigation analysis in accordance the EO 11990 that takes into account avoidance, minimization and compensatory mitigation.
4	4-125	4.3.2.2	Mitigation EO 11990	<p>The DEIS does not present avoidance and minimization measures analyzed specific to each of the road alternative or compensatory measures that could reduce or eliminate the impact. This is required under EO 11990.</p> <p>Mitigation measures as presented in the DEIS meets the requirements of NEPA or EO 11990 of 1) avoidance, 2) minimization, 3) rectify, 4) reduce, and 5) compensate. The means to mitigate the adverse impacts to wetlands have not been address in accordance with the mitigation hierarchy describe in 40 CFR 1508</p>	Recommend the discussion on EO 11990 be rewritten. It should document mitigation in accordance with NEPA requirements.

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
4	4-126	4.3.2.2	Cumulative Effects Last sentence	The additional loss of approximately 4 acres of wetlands would not have a “moderate contribution” to the cumulative effects of wetlands in the Cold Bay area since virtually all wetlands within the region would be within the refuge system.  The cumulative effect should be negligible.	
4	4-126	4.3.2.2	Conclusion	Medium intensity effects to the Kinzarof marsh system due to modifications in local hydrology and or changes to vegetation is not supported by the preceding text.	
4	4-126	4.3.2.2	Conclusion Last sentence	The conclusion that the overall impact of Alternative 2 on wetlands would be moderate is not supported by the information presented in the DEIS.	
4	4-131	4.3.2.3	p1;s4	Continuous post-construction monitoring for hydrocarbons and turbidity upstream and downstream for three years is excessive.	
4	4-131	4.3.2.3	Cumulative Effect	There is no information that anadromous streams crossed by the road would receive unreasonable fishing pressure, which would have a major effect on anadromous fish and EFH.  Sport fisherman from King Cove and Cold Bay would have access to these streams but daily bag limits have been establish by DF&G. There is no reason to assume the pressure on these streams would be greater than any other stream in the King Cove-Cold Bay area with road access.  The overall effect of the land exchange and road on fish and essential fish habitat should be negligible to minor.	See DF&G comments for suggested text.
4	4-174	4.3.3.1	Federal Aviation Lands	If the Secretary authorizes the land exchange, does the Service relinquish its “secondary management authority” referenced on page 3-202?	

Alt	Page	Section	Par.	Comment	Suggestion
4	4-179	4.3.3.1	Land Ownership  Direct and Indirect  Summary	<p>The conclusion that the land exchange as a whole would have a major impact is excessive and does not seem to match the data provided in this section.</p> <p>The Service receives approximately 50,000 acres in exchange for approximately 206 acres of Refuge lands. The lands received by the Service are within or adjacent to existing Izembek or Alaska Peninsula Refuge lands.</p> <p>The overall benefit to the Refuge system should be beneficial.</p>	
4	4-180	4.3.3.1	Land Ownership  Cumulative Impact	See comment above	
4	4-205	4.3.3.8  Cultural Resources	p1	<p>Cultural resources identified in the vicinity need to be assessed for National Register of Historic Places (NRHP) eligibility. The effect of the project on NRHP-eligible sites must be evaluated in accordance with Section 106 of the NHPA. This has not been done for this project.</p> <p>The statement that, "...it can be anticipated that ground disturbing activities are likely to encounter unknown archaeological sites within the areas of road construction," would indicate that an on-site review of the road alternatives should be completed prior to the Secretary's decision.</p>	An on-site evaluation of the road corridors by a qualified archaeologist is necessary to determine if there are HRHP properties affected by either road alternative
4	4-205	4.3.3.8	Direct and Indirect Effects from Construction	There is inadequate site information for the statements made in this section. Statement made in the DEIS could be generic to any construction project in Alaska. This section implies that "known" sites could be impacted by the road construction but does not identify those sites nor discuss if there are options that would avoid the sites. It cites the potential to have direct physical impacts on unknown sites but a qualified archaeologist evaluated neither road alternative alignment on-site.	

<b>Alt</b>	<b>Page</b>	<b>Section</b>	<b>Par.</b>	<b>Comment</b>	<b>Suggestion</b>
4	4-205	4.3.3.8	Summary	There is insufficient data to conclude that the road construction would have a moderate to major impact on cultural resources.	An on-site evaluation of the road corridors by a qualified archaeologist is necessary to determine if there are HRHP properties affected by either road alternative.
4	4-205	4.3.3.8	Mitigation	<p>It appears that these mitigation measure would apply to the State should the land exchange be approved by the Secretary.</p> <p>However, it is the Federal lead agency's Section 106 responsibility to identify, evaluate and assess adverse effect and mitigate, as appropriate, NRHP properties prior to their action (i.e. the land exchange).</p> <p>Intensive survey could be required as mitigation through a Section 106 agreement in accordance with 36 CFR Part 800.</p>	
4	4-205	4.3.3.8	Conclusion	There is no documentation in the DEIS to support the conclusion that Alternative 2 would have moderate to major effects on historic properties.	

# Izembek National Wildlife Refuge Land Exchange/Road Corridor Preliminary Draft EIS Review Comments

May 3, 2012 Commenter(s):

Tribe/Agency/Organization: Alaska Department of Environmental Conservation

Branch/Division (if applicable): Contaminated Sites Program

Chapter	Page	Section	Paragraph	Comment	Suggestion
3	3-26			<p>Figure 3.1-4 shows contaminated sites in the Cold Bay area. The AT&amp;T Alascom Cold Bay Earth Station and Camp appear to be located within a proposed land transfer area. This site is closed with institutional controls. Contaminated soil exceeding ADEC cleanup levels remains beneath the emergency generator building. ADEC has determined that this soil does not pose an unacceptable risk to human health or the environment. No further remedial action is required until the building is removed and the contaminated soil becomes accessible. ADEC will be notified at that time as to what steps are required to address these soils. This IC will remain in effect until future testing shows that the soil remaining has contaminant levels below ADEC cleanup levels.</p>	<p>Confirm the location data for this site to determine if it does fall within one of the proposed land transfer areas. If so, discuss in the section titled "Known Contamination on Lands Proposed for Exchange" on page 3-29. Add text as noted in the comment.</p>
3.1	3-29	3.1.5.2		<p>Second to last paragraph on this page beginning w/ 'Petroleum hydrocarbon contaminated soil...', revise the last sentence by removing the 2010 date. After which add the following statements: 'In 2010 the USCG 1,100 cubic yards of fuel-contaminated soil from three stockpiles that was determined to</p>	

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<p>all be below site-specific alternative cleanup levels as a result of the 2006 characterization sampling. In 2010 the USCG also conducted ground water and soil data gap sampling. According to the subsequent draft 2011 report, ground water analysis results in all but two monitoring wells were below ADEC cleanup levels in 2006, and the remaining two with 2006 exceedances were below ADEC cleanup levels in 2010. Fuel-contaminated soil exceeding the site-specific alternative cleanup level was identified in a wetland and the upgradient stream drainage in 2010. The results of soils sampled in 2010 from a former battery disposal area associated with a landfill indicated lead contamination that will also require further characterization and removal. The USCG remains the responsible party for all of the known and potentially unknown contamination issues at Sitkinak Loran C Station. ADEC recommends that all contamination and remediation issues be adequately identified and addressed by the USCG prior to the transfer of the land to any new landowner and/or any change of land use occurs; as also discussed on pages 3-23 and 3-24 section in section 3.1.5 of this EIS.</p>	



















REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
U.S. ARMY ENGINEER DISTRICT, ALASKA  
REGULATORY DIVISION  
P.O. BOX 6898, CEPOA-RD  
JBER, ALASKA 99506-0898

MAY 04 2012

Regulatory Division  
POA-2010-286

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

Dear Ms. Brady:

This letter is in response to the Draft Izembek National Wildlife Refuge Proposed Land Exchange Environmental Impact Statement (EIS) that was provided for our review. The U.S. Army Corps of Engineers (USACE) is participating as a cooperating agency in the EIS development process.

Enclosed please find our comments on the Draft EIS (DEIS), in the table format requested. Additionally, in our continued written and verbal correspondence with the U.S. Fish and Wildlife Service (USFWS) on this project since April 29, 2010, USACE has repeatedly identified specific information that should be included in the EIS that will be needed for our future permit evaluation, if a Department of the Army permit application is submitted. The required information includes a wetland delineation verified on-the-ground, any applicable edits of the wetland functional assessment in the DEIS, and a cultural resources survey to ensure compliance with Section 106 of the Historic Preservation Act of 1966.

To the fullest extent possible, agencies shall prepare draft environmental impact statements concurrently with and integrated with environmental impact analyses and related surveys and studies required by other environmental review laws and executive orders, (40 CFR 1502.25), which includes Section 404 of the Clean Water Act. The Omnibus Public Land Management Act of 2009, also states that "the plan developed under this subsection shall comply with Section 404 of the Federal Water Pollution Control Act (33 U.S.C. 1344) with regard to minimizing, to the greatest extent practicable, the filling, fragmentation or loss of wetlands, especially intertidal wetlands, and shall evaluate mitigating effects of those wetlands transferred in Federal ownership under the provisions of this subtitle." Furthermore, on page 1-10 of the DEIS, the USFWS states "The Corps' role as a cooperating agency is to ensure the EIS process considers the Corps' requirements under NEPA and the Section 404(b)(1) Guidelines."

For these reasons, the USACE strongly encourages the USFWS to include the above-mentioned information in the EIS, to provide the technical and

scientific basis for federal regulatory determinations and permit decisions.

Without this information, the EIS will not be sufficient for the USACE to evaluate compliance with NEPA or the 404(b)(1) Guidelines, should a permit application be submitted for construction of a road. If USFWS is not able to include this information in the EIS, we request a written response from USFWS identifying the reasons this information will not be included in the EIS document.

The USACE appreciates your continual coordination and our involvement in the EIS development process. Please contact Ms. Heather Boyer, or myself, via email at Heather.L.Boyer@usace.army.mil, by mail at the address above, by phone at (907) 753-2712, or toll free from within Alaska at (800) 478-2712, if you have questions.

Sincerely,



Shannon Morgan  
Team Leader, South Section

Enclosures

## Izembek National Wildlife Refuge Land Exchange/Road Corridor Draft EIS Review Comments

Please record technical and editorial comments in the attached table. Note as much information as you can about the chapter/appendix, page number, section, and paragraph for each comment. Please refrain from general observations and comments that do not require a response. You can also paste text from the draft document into the table, if that is the best way for you to explain your comments. Please provide positive suggestions for desired changes, as applicable.

If there are policy related comments, please address a formal letter to the Service. Do not include policy comments in the table.

Multiple reviewers from the same branch, division, or organization should use the same table to consolidate thoughts and minimize duplications and conflicting reviews. Please complete the form in Microsoft Word and return it electronically. Email comments to [Stephanie\\_Brady@fws.gov](mailto:Stephanie_Brady@fws.gov) by Friday, May 18, 2012.

### Example

Chapter	Page	Section	Paragraph	Comment	Suggestion
1	1-7	1.3.2	3	Delete the phrase "northeast corner of Cold Bay." Global search/replace through document.	Replace with Northeast Hovercraft Terminal
1	1-12	1.3.3	2	<i>[Example of pasting text from the document:]</i> <i>Expand description of basic and overall project purpose:</i> The basic project purpose is to provide an alternative transportation system between the City of King Cove and the Cold Bay Airport. The overall project purpose is to construct a long term, year round transportation system between the cities of King Cove and Cold Bay.	<i>Suggested replacement text:</i> The basic purpose is used to determine if a given project is water dependent and requires access or proximity to, or siting within, a special aquatic site to fulfill its basic purpose. The overall purpose is an independent assessment of the project purpose by the Corps to accommodate a range of alternatives for consideration and to evaluate less environmentally damaging practicable alternatives. The basic project purpose is to provide a transportation system between the City of King Cove and the Cold Bay Airport. The overall project purpose is to construct a long term, safe and reliable year round transportation system between the cities of King Cove and Cold Bay.
2	2-12	Fig. 2-3		Make map larger (11 x 17); green/blue shades do not have enough contrast – cannot see difference between boundary lines	Replace with green with gold
3	3-10	Table 3-2		Not clear how data were generated; table needs more explanation	Include calculation reference in table notes

**Commenter(s): Heather Boyer**

**Tribe/Agency/Organization: U.S. Army Corps of Engineers**

**Branch/Division (if applicable): Regulatory Division**

<b>Chapter</b>	<b>Page</b>	<b>Section</b>	<b>Paragraph</b>	<b>Comment</b>	<b>Suggestion</b>
1	1-8	1.5	1	The EIS may not provide all the technical and scientific basis for federal regulatory and permit decisions	Replace with "The EIS may provide some of the technical and scientific basis..."
1	1-10	1.5	7	The Corps' role as cooperating agency is correctly stated, however, the FWS has not fully considered the Corps' requirements	For the sake of full disclosure to the public we request that the EIS state in this section that the FWS has not fully incorporated the Corps' requirements and why – the Corps understands why and the limitations of the FWS, but we have yet to see the reasons stated in writing and believe a statement in the EIS is important so the public and interested parties are fully aware that additional information will be required beyond this EIS.
2	2-25	2.4.2	Last bullet of components sections	Hauling material from Sand Point seems, from this description, a likely need should a road be constructed, and could cost \$2-3 million more – is this cost included in the cost of road construction for each of the road alternatives?	Please indicate in the EIS whether this has been included and if not, please include this information in the cost of road construction
2	2-49	2.6	2	The public and other agencies can assist in the development and determination of the	Although from the Corps perspective the focus is similar, there is a distinct

Chapter	Page	Section	Paragraph	Comment	Suggestion
				environmentally preferable alternative – Shannon and Glen – should we comment about this? I know this isn't the same as our LEDPA, but I'm wondering how this might relate???	difference in what is required for public disclosure under NEPA for identifying an environmentally preferable alternative and a determination of compliance identifying the least environmentally damaging practicable alternative (LEDPA). The Corps typically does not identify an environmentally preferable alternative. The substantive regulations that the Corps must comply with e.g., 40 CFR 230 requires that the Corps permit only the LEDPA, unless this alternative would have other significant adverse impacts.
2				General comment on chapter 2 is that Alternatives 1 and 4 discuss the hovercraft as not being practical due to cost for the AEB, but does not address AEB or the state's ability to pay for any of the other alternatives.	Clearly outline in this chapter of the EIS why the cost to operate this alternative is not practicable (or is unreasonable).
4	4-125	4.3.2.2	13, Summary section	The EIS states in this section that there would be a beneficial effect to wetlands as a result of the land exchange. Although wetlands managed as wilderness would receive more legal protection than wetlands managed by the state of Alaska, in reality, the wetlands proposed for exchange from the state are under no threat of development, occur within a very similar remote area far removed from human induced impacts and for all practical	Either remove the statements about the land exchange being a benefit to wetlands, or clarify that the Corps believes the land exchange would not result in a real benefit to wetlands.

Chapter	Page	Section	Paragraph	Comment	Suggestion
				<p>purposes function as wild areas much as officially designated wilderness areas do. The Corps does not believe the land exchange would result in a benefit to wetlands. While lands may change ownership and management plans change, there is no gain to the amount of wetlands, no significant added protections to existing wetlands that are currently under any threat, nor is there any threat to these wetlands in the foreseeable future. Furthermore, as the EIS states, the wetlands that would be impacted by a road are of a much higher value than state lands offered in the exchange. From the Corps perspective, there is little to no benefit to wetlands that would result from the proposed land exchange. Furthermore, the purpose of the land exchange is for a road which would have negative effects on wetlands. The EIS is misleading in telling the public that there would be a benefit to wetlands.</p>	
4	4-125	4.3.2.2	16, Mitigation Measures	<p>Identification of appropriate mitigation measures is not possible until an accurate, on-the-ground wetland delineation and functional assessment is obtained. EO 11990 requires that all Federal agencies provide leadership and shall take action to minimize the destruction, loss or degradation of wetlands...in carrying out</p>	<p>On-site wetland delineation and updated functional assessment should be completed this field season for both road alternatives and the EIS should be updated to reflect this data. The EIS should include appropriate mitigation measures in regards to wetlands, and not postpone development of these</p>

Chapter	Page	Section	Paragraph	Comment	Suggestion
				the agency's responsibilities. (EO 11990 Section 1). The Corps believes in this case the responsibility lies with the lead federal agency since the Corps has no federal action or permit application at this time. Therefore, the EIS should address this issue relative to their action and not defer it to the Corps at a later date.	measures until after the EIS is completed, as suggested in the DEIS.
4	4-126	4.3.2.2	15, Cumulative effects	The use of the words "net gain" may be true in the sense that the refuge would gain wetlands under their control, but there is no real net gain in the amount of wetlands in reality, on the ground. The use of this word is misleading – no wetlands would be gained from the land exchange and could be confused with the Ex. Order regarding the no net loss policy regarding wetlands.	Clarify in this sentence that the net gain refers only to the refuge gaining wetlands under their control and that it does not mean there is actually a net gain in the amount/acreage/ecological function of actual wetlands.
4	4-237 through 4-238	4.4.2.2	9, 11, 14	Same comments as above related to benefits to wetlands from the land exchange – furthermore, by that logic, the other alternatives should discuss the negative effects to wetlands from not doing the land exchange – probably because it's obvious there would be no negative effects to wetlands if the land exchange doesn't go through. Just pointing that out to show the logic of saying the land exchange benefits wetlands doesn't hold up.	See above comments

**Izembek National Wildlife Refuge Land Exchange/Road Corridor Draft EIS Review Comments  
From David Ward**

<b>Chapter</b>	<b>Page</b>	<b>Section</b>	<b>Paragraph</b>	<b>Comment</b>
Ex Sum	7		2- Affordable...	Needs a statement that a new road does not guarantee that travel between King Cove and Cold Airport will not be restricted for extended periods of time, such as during winter snow periods.
Ex Sum	8		Alt 1	Revise ALT 1 as an option since the Hovercraft is being sold and will not be available. This would lower costs considerably for Alt 1 and should be reflected in Tbl ES-2.
Ex Sum	8		Alt 2	Because the main desire for the road is affordable access in cases of emergency, there should be a table that indicates the number of days that the PenAir plane was unable to service King Cove because of weather issues (average over years) and compare that to the hovercraft during years when both were operational.  It would also be important to know if there were any days that road btw Cold Bay and the AirForce facility (or if data are available to the former AirForce facility at Grant Pt) was not passable because of snow.
Ex Sum	16		Alt 4	Delete ALT 4 as an option since the Hovercraft is being sold.
Ex Sum	20		Tbl ES-2 Maintenance costs	I wonder about the accuracy of the expected maintenance costs for the 2 road proposals. The total costs in the table seem low. Does the total include snow removal costs or the expected extra costs of vehicle maintenance and fuel given that the length of roads will increase considerably for the state of Alaska? The State currently has trouble maintaining the runway and the road btw Cold Bay and the AirForce facility.
Ex Sum	22	ES-1.6	Alt 2-Land...  Last sentence	The road alternatives would result in distinctive changes transportation options....  Change to The road alternatives would result in distinctive changes <b>to</b> transportation options.....
Ex Sum	29	ES-Tbl 6: Noise-overall	Alt 5 -1st	Why not put decibel levels at the same distance as the hovercraft (Alt 1) so the reader can

		effects	sentence	compare noise level differences directly?
Ex Sum	29	ES-Tbl 6: Noise-cumm effects	Alt 3 2nd sentence	How can the footprint of the road be less when the road is longer in Alt 3 than in Alt 2?
Ex Sum	30	ES-Tbl 6: Plant comm effects		Did you consider potential effects of increased road dust on adjacent plant and nesting bird species? Studies at Denali NP may provide some insight on potential impacts? Perhaps the increased dust would impact nesting densities of Rock Sandpipers, which are significant in the isthmus (Sowl pers comm) in June. There is no mention of a conservation concern for this species in Chap 3 (3.2.4.11).
Ex Sum	32	ES-Tbl 6: effects on fish		Did you consider potential effects on nearby streams or rivers adjacent to those that will be directly crossed by the proposed road? I'm thinking about the Joshua Green River, which would now be easily (short walk) accessible from the proposed road. Increased fishing and disturbance to this river could have a major impact on fish stocks and wildlife that are dependent on the river. I'm wondering how the anticipated effect on anadromous species is not anticipated to be measureable?
Ex Sum	34	ES-Tbl 6: effects on land mammals		The proposed road would increase access and have a significant impact on how bears and caribou navigate the refuge and greater area. As above, with greater access to the Joshua Green River, human activities will likely increase and affect movements and distributions of brown bear through increased hunting opportunities and indirectly through increased disturbance. Right now "the effects" only states major impacts to bears in the isthmus and moderate for project area. It should be restated that impacts will be major for the isthmus and project area.

## **APPENDIX G-3**

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### **SAMPLE COMMENT LETTERS**

#### **D. Comments submitted by Tribes and Alaska Native Corporations**



# Alaska Native Health Board

1840 Bragaw Street, Suite 220  
Anchorage, Alaska 99508

Phone: (907) 562-6006  
Fax: (907) 563-2001

May 1, 2012

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

Re: Izembek Land Exchange/Road Corridor Draft Environmental Impact Statement  
Request for Public Comment  
**Expression of Support for the Land Exchange & Selection of Alternative #2**

Dear Ms. Brady,

On behalf of the Alaska Native Health Board (ANHB), I write in support of the land exchange authorized by Congress to provide safe and affordable road transportation for residents, workers, and visitors between the City of King Cove and the Cold Bay airport.

ANHB is a statewide organization representing Tribes and Tribal organizations carrying out health services on behalf of the 231 federally-recognized tribes in the state of Alaska pursuant to the Indian Self-Determination and Education Assistance Act, P.L. 93-638, as amended.

We want to express our wholehearted support for King Cove's effort to have a road. This is one place where the Department of the Interior (Department) can get it right, where it is possible to accommodate the land use needs of an indigenous people and add significant acreage to the nation's publicly owned wetlands and wilderness. The community has expressed a strong preference for the route as laid out in Alternative #2. We understand that this means that a 19 mile, all-weather gravel road would be built on 227 acres of Federal land that would be transferred to the State of Alaska. We support them and write in favor of Alternative #2.

We want the members of the Agdaagux and Belkofski tribes to know that we believe they will work successfully with their state government and build this road to the highest standards; we have no doubt the construction will be closely scrutinized, as is appropriate to the quality of the land. To pursue their request of 9 miles through the Izembek Refuge, the tribes, State of Alaska, the King Cove Corporation, City of King Cove, and the Aleutians East Borough have formed a unique partnership and spoken in one voice in favor of this project and they have done so over many decades. They got together and designed a land assemblage that includes quality wetlands,

ALASKA NATIVE TRIBAL HEALTH CONSORTIUM  
ALEUTIAN/PRIIBLOF ISLANDS ASSOCIATION  
ARCTIC SLOPE NATIVE ASSOCIATION  
BRISTOL BAY AREA HEALTH CORPORATION  
CHUGACHMIUT  
COPPER RIVER NATIVE ASSOCIATION  
COUNCIL OF ATHABASCAN TRIBAL GOVERNMENTS  
EASTERN ALEUTIAN TRIBES

KARLUK IRA TRIBAL COUNCIL  
KENAITZE INDIAN TRIBE  
KETCHIKAN INDIAN COMMUNITY  
KODIAK AREA NATIVE ASSOCIATION  
MANIILAQ ASSOCIATION  
METLAKATLA INDIAN COMMUNITY  
MT. SANFORD TRIBAL CONSORTIUM  
NATIVE VILLAGE OF EKLUTNA  
NATIVE VILLAGE OF TYONEK

NINILCHIK TRADITIONAL COUNCIL  
NORTON SOUND HEALTH CORPORATION  
SELDOVIA VILLAGE TRIBE  
SOUTHCENTRAL FOUNDATION  
SOUTHEAST ALASKA REGIONAL HEALTH CONSORTIUM  
TANANA CHIEFS CONFERENCE  
YUKON-KUSKOKWIM HEALTH CORPORATION  
VALDEZ NATIVE TRIBE

pristine wilderness, and prime wildlife habitat. The Service is on the verge of receiving a spectacular gift. The appropriate response is to accept it. With thanks.

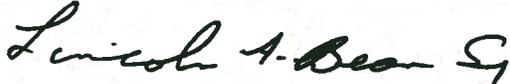
One of the factors included in the draft Environmental Impact Statement (EIS) is an analysis of the "Environmental Justice" of this action. We looked up the source of those words and traced them to Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Signed on February 11, 1994, this directive orders each Federal agency to "make achieving environmental justice part of its mission" which you do by "identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

The conclusion under the environmental justice heading in the DEIS is that a no road decision will have "no adverse affects" on the low-income and minority populations of King Cove. How can that possibly be? Surely their human health will suffer greatly if the decision by the Department should find that the road is not in the public interest and it is surprising that the report doesn't say so. Similarly, there is an adverse economic affect to King Cove's low-income and minority residents if this road is denied, as they are quite literally trapped, either because the cost of the flight to Cold Bay is out of reach or because they can't risk that bad weather will prevent their timely return to jobs and families. Where is an estimate of value of the lands that are proposed for exchange? And the residents of King Cove have waited decades for their moment of environmental justice, having been denied a full participation in the initial hearings on this Refuge. We sincerely hope their moment is now.

Congress was persuaded of the merits of King Cove's request for safe, reliable and affordable road transportation for its citizens, otherwise they wouldn't have passed the legislation that has required this draft EIS. The federal government should take the next step and accept this unparalleled opportunity by adopting Alternative #2 as the most responsible choice, but also because it brings invaluable new lands into the public domain and represents the most equitable solution for the Aleut shareholders of the King Cove Corporation.

Please contact Lanie Fox, ANHB President/CEO ([lfox@anhb.org](mailto:lfox@anhb.org), 907-562-6006), with any questions or if additional information is necessary.

Sincerely,



Lincoln Bean, Sr.  
Chairman, Alaska Native Health Board

Good afternoon, my name is Dale Gould, and I am currently the President of the Agdaagux Tribal Council of King Cove. I was also born and raised in King Cove and recently moved my family here from Wasilla. We thank you for coming here in person to do the government to government consultation. Recognizing that consultation comes in various forms we are glad you are taking the time to fully understand our issue. Knowing that in the very near future a decision will be made concerning the preferred alternative by the U.S. Fish & Wildlife therefore we have asked that the tribal membership and leaders fully participate. This is an issue that has taken its toll on this community by loss of lives and has compromised many people's health. Too many people are afraid to fly between these two communities and for good reason. Getting people to Cold Bay in times of medical emergencies is precarious on many occasions and puts the lives of those involved in danger.

During the course of the testimony today, you will also hear the ties that the people have with the Izembek Refuge. For many centuries, we were tied to this land and the documentation of the many Aleut Village sites reflects this. We remain respectful of these lands as they are a part of our heritage. As you select an alternative for the Izembek land exchange EIS, and hopefully a road between King Cove and Cold Bay, from one government to another, please remember this: we are those who describe ourselves as belonging to the land, not the other way around. It is no small difference and worth noting that most of human history is caught in the conflict between those two philosophies.

Please understand that we would be thoroughly disappointed if the No Action alternative is selected. Too much is on the table and given up by the very people it impacts the most. If we could have stood as equals in this process, as one government should be with another, then resolutions might have been reached, lands exchanged, and mutual respect restored. But we were not equals in the process. In fact, it feels more like we were just one of several species to be studied and judged worthy or not, and then ranked in order of importance to the Refuge. I cannot tell you how disrespectful that feels to me, and all who came before me.

Since our transportation options are in your hands, then surely the “environmental impact” on the Izembek by Aleuts for thousands of years must be studied also, as a matter of basic fairness. If we are to be subjected to your science and your judgment, then surely the rules of this road must answer this question: What has been our impact so far? Have we destroyed or preserved habitat needed for plants and animals to thrive? Please include the answer in the report. Because it does not feel like our history has been respected in this issue.

I urge you to hear us. Respect us. Work with us to restore trust. Watch us every foot of the way if need be, we expect no less. But do not call this the road to nowhere. In fact while you are viewing Cold Bay, take a look at the Frosty Road that was “cherry-stemmed” out of the wilderness by USFWS. Real people have lived here longer than archeologists can imagine and before there was anyone alive to be called an environmentalist. Which is just a word after all: It’s how a person lives that matters. The health and safety of our members comes first. We do matter and it is part of the culture of the community of King Cove, handed down generation to generation to work together with each other and other to make our lives better. Thanks for listening.

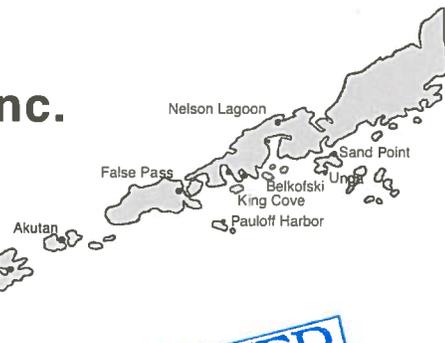


St. Paul

St. George

# Aleutian Pribilof Islands Association, Inc.

1131 E. International Airport Rd.  
Anchorage, Alaska 99518-1408  
Phone (907) 276-2700  
Fax (907) 279-4351



May 11, 2012

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

Re: Izembek Land Exchange/Road Corridor Draft Environmental Impact Statement  
Request for Public Comment  
**Expression of Support for the Land Exchange & Selection of Alternative #2**

Dear Ms. Brady;

The Aleutian Pribilof Islands Association, Inc. wholeheartedly supports the long withstanding efforts of King Cove to have a road. This is one place where the Department of the Interior (“Department”) can get it right, where it is possible to accommodate the land use needs of an indigenous people AND add significant acreage to the nation’s publicly owned wetlands and wilderness. The community has expressed a strong preference for the route as laid out in Alternative #2. We understand that this means that a 19 mile, all-weather gravel road would be built on 227 acres of Federal land that would be transferred to the State of Alaska. The Aleutian Pribilof Islands Association, Inc. fully support them and write in favor of Alternative #2.

We want the members of the Agdaagux and Belkofski tribes to know that we believe they will work successfully with their state government and build this road to the highest standards; we have no doubt the construction will be closely scrutinized, as is appropriate to the quality of the land. To pursue their request of 9 miles through the Izembek Refuge, the tribes, State of Alaska, the King Cove Corporation, City of King Cove, and the Aleutians East Borough have formed a unique partnership and have spoken in one voice in favor of this project and they have done so over many decades. Together they designed a land assemblage that includes quality wetlands, pristine wilderness, and prime wildlife habitat. The Service is on the verge of receiving a spectacular gift. The appropriate response is to accept it; with gratitude.

One of the factors included in the draft EIS is an analysis of the “Environmental Justice” of this action. We looked up the source of those words and traced them to Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income

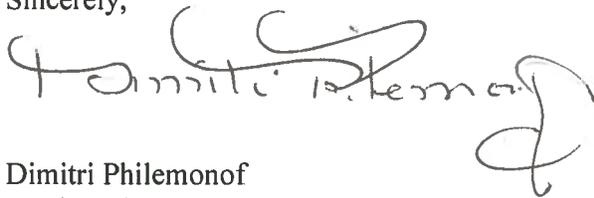
Populations. Signed on February 11, 1994, this directive orders each Federal agency to “make achieving environmental justice part of its mission” which you do by “identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.”

The conclusion under the environmental justice heading in the DEIS is that a no road decision will have “no adverse affects” on the low-income and minority populations of King Cove. How can that possibly be? Surely their human health will suffer greatly if the decision by the Department should find that the road is not in the public interest and it is surprising that the report doesn’t say so. Similarly, there is an adverse economic affect to King Cove’s low-income and minority residents if this road is denied, as they are quite literally trapped, either because the cost of the flight to Cold Bay is out of reach or because they can’t risk that bad weather will prevent their timely return to jobs and families. Where is an estimate of value of the lands that are proposed for exchange? And the residents of King Cove have waited decades for their moment of environmental justice, having been denied a full participation in the initial hearings on this Refuge. We sincerely hope their moment is now.

Congress was persuaded of the merits of King Cove’s request for safe, reliable and affordable road transportation for its citizens, otherwise they wouldn’t have passed the legislation that has required this DEIS. The federal government should take the next step and accept this unparalleled opportunity by adopting Alternative #2 as the most responsible choice, but also because it brings invaluable new lands into the public domain and represents the most equitable solution for the Aleut shareholders of the King Cove Corporation.

We appreciate your consideration of our remarks and for the opportunity to comment on this issue that is so very important to the residents of King Cove.

Sincerely,

A handwritten signature in black ink, appearing to read "Dimitri Philemonof". The signature is fluid and cursive, with a large loop at the end.

Dimitri Philemonof  
President/CEO

Hello, my name is Leff Kenezuroff, I am the President of the Belkofski Corporation and a member of the Belkofski Tribal Council. I would like to testify on behalf of the land exchange and state that we support the efforts of the King Cove Corporation, the State of Alaska, the City of King Cove, and the Aleutians East Borough.

I would also like to reference an issue of grave sorrow to the people of this community, many of whom at one time lived in Belkofski. When you look at the map that shows the various hunting cabins and sites within the Leonard's Harbor area all the way through to Kenezuroff's Lagoon and into Cold Bay you will see the many names associated with those sites. When we lived in Belkofski, we walked this whole area hunting, fishing and trapping. This was our means of livelihood utilized by our ancestors for thousands of years. The wildlife associated to these lands was our subsistence and means for survival. We only took what we needed and were taught to always maintain for a renewal resource for the future of our children.

We did not know what was happening when these cabins were being burned. No one told us that these lands had been designated wilderness, we only knew they were gone. We were told by Sea Otter Jones that this land now belongs to the government. The government has taken much from us without consulting with us directly, a part of who we are.

We thank you for being here today and hope you seriously take into consideration the heartfelt testimony from the tribal members of both King Cove and Belkofski. As long as we continue to live here, and we intend to, safe access is important to the wellbeing of the people.

Lucy and I are elderly and we have many medical issues and have been medivaced out of this community on many occasions. A number of times we went by boat, plane, hovercraft and coast guard. I am thankful that I am here today to speak to you. If I was not able to get to Cold Bay when I had my last heart attack, I would not be here. The coast guard waited in Cold Bay for an hour and a half and made another attempt to get me out of King Cove. A road is our only reasonable alternative for this community. Thank you.

My name is Simeon Kuzakin. I am the President of the Belkofski Tribal Council. During the course of the Public Hearing process, I testified in support of the lands being offered for exchange by the King Cove Corporation and the State of Alaska to the federal government. I testified about the injustice done to us by the designation of wilderness and how the cabins owned by my family were destroyed. Cabins that I lived in as a child to hunt and trap. I testified to the hardships that inadequate access to Cold Bay has caused me and my late wife. My wife testified many a time in regard to the hardship she went through over the years prior to her death in support of a road between King Cove and Cold Bay.

I am aware that soon a preferred alternative will be made public as part of the draft E.I.S. On behalf of the Belkofski Tribe, we do not support a "No Action" alternative. We need this road to Cold Bay. It is our only means of safe transportation. We are willing to work with all of the involved governments to make this work. The health and safety of our tribal members, and the members of the Agdaagux Tribe, are our highest priority. We should be taken seriously by the government of the United States of America, and particularly the Secretary of the Interior, who has a trust responsibility to us.

We are to understand that this process is to establish whether or not this land exchange is in the best interest of the public – with land exchange being the key words here. As the next round of public meetings begin, please know, we will be there every step of the way. It is only right that after all of this time the right decisions are made. We have sacrificed too much already and it is time to make it right.

We have ties to all of the wildlife that lives in the Izembek Refuge. This wildlife is part of who we are. It would benefit all of us now if the Izembek Refuge staff worked closer with this community, instead of making what we know only a memory of our past. We thank you for taking the time for this government to government consultation, and would like it to be meaningful and respectful to our tribal members in this community, as well as those members who live in Cold Bay.

Good afternoon, my name is Dean Gould. I am the President of the King Cove Corporation. Like many of the people in this room, I was also born and raised here. The King Cove Corporation has played an instrumental role advocating for a road between King Cove and Cold Bay for many decades now. On numerous occasions, we met with representatives of the U.S. Fish & Wildlife discussing a potential land trade so that we could get access to the airport in Cold Bay. We were told that the only way we can get access is by an act of Congress.

During 1997-98 when the King Cove Health and Safety Act was passed by the US Senate, we had proposed an exchange of 680 acres of our lands in the vicinity of Kinzarof Lagoon, in exchange for about 200 acres for a road right-of-way from the federal government. Today, almost 15 years later, we stand before you again with an offer of over 15,000 acres of our land, along with the State of Alaska's 42,000 acres, in exchange for this modest road right-of-way. We are not trying to set a precedent for future roads within wildernesses in the United States, but we are asking for an exchange of land that would allow us safe access to Cold Bay. It has taken us many decades to be where we are today and it has not been an easy process. We have spent a lot of money to get to this point. We are also willing to give back to the federal government about 20% of the lands that same government gave us to settle aboriginal land rights back in the early 1970's.

Had we been given notice during the selection of the wilderness boundaries in the 1970's we would have been at the table. As you can see, our lands on the Cold Bay side are not connected to our lands on the King Cove side. We would have made sure those boundaries would have allowed us access to all of our lands and would not be going through this process today.

Time and time again, we have tried to work with Cold Bay residents, visitors, and government employees in regard to this issue. We are aware of numerous trespassing issues that occur on our lands. We prefer a solution of working together and not against each other. Please know the King Cove Corporation Board has discussed the possibility of not allowing any access to our lands, other than by our shareholders and their descendents. We know this will

require us to pay for someone to enforce these policies on our lands, and if necessary, we will go to this extent.

I request that on behalf of our shareholders, who are also tribal members, that you make a careful consideration regarding the preferred alternative for the EIS. We cannot continue to have this community put in a situation that leaves its members in danger when traveling to and from Cold Bay. We also advocate that the two communities working together, including the tribal councils, city councils and ANSCA Corporations with Fish & Wildlife in Cold Bay, can only strengthen our ability to make sure our concerns are addressed and properly acted upon. We know that the public process will start a 45 day clock when the draft EIS is open to the public. The public meetings will be again held in the 5 communities. We are fishermen and would like the opportunity to address the draft EIS. We would like to make sure that the date is set when we know we will be available. Thank you for taking the time to visit King Cove.

Date Submitted: 5/10/2012

Hi Stephanie,

I don't think that I was to clear on what I was trying to say with my comments at the meeting. Thinking about it later, I'm not sure if I really understood what I said myself. I get tongue tied at those things.

I believe that all creatures have equal rights on this planet. Us humans have undoubtedly ruined a lot of it. To prevent further disruption, destruction and irritation to wildlife, all the necessary precautions, safeguards and use stipulations that FWS will include, force or enforce on the new road, should be sufficient to allow it to proceed. Not to mention the huge expansion of the Refuge FWS stands to gain by the road transaction.

The airport at King Cove is arguably the most dangerous airport in the State. I myself refuse to fly in there. I travel to many environmental conferences on behalf of Nelson Lagoon throughout the year and I have had the unfortunate opportunity to land and take off at King Cove Airport. There is nearly a mishap every time any plane has to land or take off there. Everyone that I know dreads the idea of flying in or out. Most resident would rather take a boat than fly in or out. Most pilots will not fly in or out of there unless conditions are at their best. The weather that your team experienced yesterday was mild compared to what it is normally like.

As you had heard repeatedly over the years is what the road will provide for the residents of King Cove, visitors, my family and friends. It will ensure that people will have access to adequate emergency and safety resources that all in the real world take for granted. We can't go to the nearest hospital in a matter of minutes when a health emergency arises. With the road we could. We would be minutes away from a medevac plane waiting in Cold Bay. As you know that service is as comparable to a regional hospital as it gets. Not allowing the road to proceed, will undoubtedly be denying the people of King Cove and anyone who visits there, the security of a person's health and wellbeing. The security that most already have, and deserve. Think about that, denying you your health and wellness. Isn't that a constitutional right for all Americans!

Animals are not given much credit by most people and Environmental Fanatics. Birds, Caribou, and wildlife in general, are very adaptable and resourceful. They have to be to survive this country. People who don't live here don't grasp that. In Nelson Lagoon, we live right by Geese, Foxes, Eagles, Bears and other wildlife on a daily basis. I have foxes that check my porch everyday to see if the dog hadn't finished his food. Do I feed them, not intentionally, but they have no problems with people when making their rounds. They pass right by me when I am in my yard or at work. They could care less about me. They don't like my dog, but he is not nearly fast enough to catch a fox. Geese eat on our beaches, in our yards, at the scattered berry patches throughout the community and area surroundings. They are always aware of any movement, and react accordingly. If they were as fragile as some uneducated people believe, this kind of behavior would most likely put an end to them. But they are thriving. We often see

10-12 goslings per pair in the spring. Something must be working. To say that a road will add hardship or demise of these magnificent, resilient creatures, is not likely, not from my experiences. I wouldn't be surprised if they used the road themselves to have a safe view of their surroundings and to eat the sweet grass grown along the road. And where there are Geese inland, could mean a new patch of berries the next spring.

At the meeting it was said, at least what I got out of it, was to be no commercial activity. Does this also exclude people who want to travel to our region to watch the wildlife. I hope not. Educating people and expanding their awareness of wildlife could only improve the lasting important impressions these creatures have in our hearts and our lives. I could live and work anywhere on this planet, I choose here. Right here!

Thank You.

Sincerely, Mark A. McNeley

Nelson Lagoon Tribal Council Environmental Department

Mark McNeley, Director

934 Main Street

Nelson Lagoon, Alaska 99571

Cl: 989-4070 (Preferred)

Ph: 989-2217 Fx: 989-2259 Em: m\_mcneley@hotmail.com



**OLD HARBOR**  
NATIVE CORPORATION

**May 16, 2012**

**TO: Stephanie Brady, Project Team Leader, U.S. Fish and Wildlife Service**  
**FROM: Carl Marrs, Chief Executive Officer, Old Harbor Native Corporation**  
**RE: Izembek National Wildlife Refuge Land Exchange/Road Corridor**

Dear Ms. Brady,

I am writing today to express my support for the Izembek National Wildlife Refuge Land Exchange/Road Corridor. This single lane gravel road will provide the necessary infrastructure to ensure that the people of King Cove have easy access to one of the regions' only airports capable of providing emergency medical evacuations. The impacts this project will have to the safety and quality of life for the people of King Cove and Cold Bay residents cannot be ignored.

After reading the DRAFT EIS statement I am in full support of the project. The original hovercraft service has proven to be too costly and difficult for maintenance and repair as well as keeping qualified personnel in the region to operate the craft. This is evident in that the Aleutians East Borough has discontinued use of the craft. I believe Alternative 1 or "do nothing" is the worst possible solution. In addition, alternatives 4 and 5 would likely run in to the same types of operational cost and quality issues as the current hovercraft operations. Furthermore, these options do nothing to alleviate our concerns for the health and safety of the people in the area via expedient access to emergency medical care.

One additional comment important to highlight is that the creation of more than 45,000 acres of *new* wilderness that would be created as part of this project was significantly downplayed in the DRAFT EIS. Please accept my letter of support for the advancement of this project.

Sincerely,

Carl H. Marrs, Chief Executive Officer

Old Harbor Native Corporation



QAGAN TAYAGUNGIN TRIBE  
P.O. BOX 447  
SAND POINT, ALASKA 99661  
PHONE (907) 383-5616  
FAX (907) 383-5814

May 9, 2012

Stephanie Brady  
U.S. Fish and Wildlife Service  
1011 East Tudor Road  
Anchorage, AK 99503



RE: Izembek National Wildlife Refuge Land Exchange/Road Corridor Draft EIS

Dear Ms. Brady,

My Name is Rayette McGlashan, I am the President of the Qagan Tayagungin Tribe of Sand Point. The purpose of this letter is to speak in favor of alternatives 2 or 3 proposed in the Izembek National Wildlife Refuge Land Exchange/Road Corridor Draft Environmental Impact Statement. King Cove is our neighboring community, and a number of our tribal members reside in King Cove. As such, we have very real interest in supporting the safest possible alternative for our Tribal Members, and the community of King Cove at large.

After reviewing the Draft Environmental Impact Statement the tribe finds it to have grossly understated the impact to Public Health and Safety and Cultural Resources should no action be taken (minor/no effect respectively). As the hovercraft is no longer in operation, to do nothing would have a major adverse impact on the health and safety of the community of King Cove as the community would have limited to no access to lifesaving health care during inclement weather. The Qagan Tayagungin Tribe also considers our elders to be highly valuable cultural resources. Hand in hand with the major adverse impact to health and safety if nothing is done, should the individuals needing access to life saving health care be our elders, we are in jeopardy of losing an invaluable cultural resource.

After speaking to tribal members who have experience living in Cold Bay and the area, as well as experience hunting, and flying in the area we believe the estimated adverse effects on the tundra swans, brant, and emperor goose in alternatives 2 and 3 to be over stated. We the native people of this region are more familiar with the migrating patterns and behaviors of the animals here than anyone else. We are also more vested in insuring these resources thrive as our people have been relying on them for thousands of years for our own survival.

Looking at the alternatives proposed in the draft environmental impact statement from a fiscal point of view, alternative 2 has an estimated cost of \$23.4 million, alternative 3 \$25.7 million, alternative 4 \$44.4 million, and alternative 5 \$70.2 million. Living at this point in time where our country is facing such an enormous debt level, and speaking on behalf of our tribal members who are also tax payers, I cannot imagine how alternatives 4 and 5 can even be rationalized.

The Qagan Tayagungin Tribe of Sand Point fully supports alternative 2, the land exchange and southern road alignment; or alternative 3, the land exchange and central road alignment. We believe either of these two alternatives would be in the best interest of our tribal members, of the community of King Cove, for our cultural resources, for tax payers, and for the environment and wildlife. We hope you will consider these comments as you move towards developing the final environmental impact statement.

Sincerely,



Rayette McGlashan

President

## **APPENDIX G-3**

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### **SAMPLE COMMENT LETTERS**

#### **E. Examples of comments submitted by citizens and non-governmental organizations**

LISA MURKOWSKI  
ALASKA

COMMITTEES:  
ENERGY AND NATURAL RESOURCES  
RANKING MEMBER  
APPROPRIATIONS  
HEALTH, EDUCATION, LABOR,  
AND PENSIONS  
INDIAN AFFAIRS

## United States Senate

WASHINGTON, DC 20510-0203  
(202) 224-6665  
(202) 224-5301 FAX

May 17, 2012

510 L STREET, SUITE 600  
ANCHORAGE, AK 99501-1956  
(907) 271-3735

101 12TH AVENUE, ROOM 329  
FAIRBANKS, AK 99701-6278  
(907) 456-0233

800 GLACIER AVENUE, SUITE 101  
JUNEAU, AK 99801  
(907) 586-7277

805 FRONTAGE ROAD, SUITE 105  
KENAI, AK 99611-9104  
(907) 283-5808

4079 TONGASS AVENUE, SUITE 204  
KETCHIKAN, AK 99901-5526  
(907) 225-6880

851 EAST WESTPOINT DRIVE, SUITE 307  
WASILLA, AK 99654-7142  
(907) 376-7665

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

**Re: Izembek Land Exchange/Road Corridor Draft Environmental Impact Statement (DEIS), Support for the Land Exchange & Selection of Either Alternative 2 or 3**

Dear Ms. Brady,

As the prime sponsor of the legislation that authorized this land exchange I find it necessary to write to provide formal comments to the U.S. Fish and Wildlife Service on the Izembek Refuge Land Exchange environmental impact statement. I am writing to fully support the selection of one of the two action alternatives that will approve the construction of the limited access road between King Cove and Cold Bay, Alaska and thus permit the finalization of the land exchange.

The King Cove Group, which includes the Agdauux and Belikofski Triad, the City of King Cove, Aleutians East Borough and King Cove Corp. have expressed a preference for either DEIS alternatives 2 or 3. I fully support them and write in favor of selecting either of these alternatives.

It is no exaggeration to say that this is a matter of life and death to the Aleut residents of King Cove. The Congress has approved this exchange subject to this EIS and the Secretary's final decision in its favor. It is time to get on with this.

As one of Alaska's elected representatives in Washington, and a life-long Alaskan, I am very familiar with the area and the treacherous weather that occurs there year round. It was not a surprise to me that your team had to change its plans last week to avoid the weather that prevented the team from completing public meetings at False Pass and Nelson Lagoon. It was also no surprise to me that your team was forced to take a fishing boat back to Cold Bay from King Cove. Welcome to the world of local residents.

Think how difficult it is for these Aleuts -- and all of the other residents of King Cove -- to worry every time they travel whether they will have weather problems, and think about what it would be like if one of your team had a medical emergency and the only option was the 2.5-hour fishing boat ride, ending with a difficult climb up a ladder at the dock in heaving seas and bad weather. But for those with medical emergencies such a climb may not even be possible.

That is why in February 2011 the U.S. Coast Guard was forced to dispatch a helicopter from Kodiak to transfer a 73-year woman suffering chest pains, while on Feb. 4<sup>th</sup> last year the Coast Guard tried, but could not reach, King Cove due to heavy snow and wind to medivac an 80-year-old King Cove woman suffering severe chest pains. She was forced to wait until the next day, but fortunately survived. That is why two days later on Feb. 6, 2011 another emergency medical transport was delayed for six hours threatening the life of the patient. Those cases are on top of the April 26, 2010 crash of a plane attempting to land at King Cove, all three passengers fortunately surviving. And the cases above don't consider the dozen people who have died and the many others who have been injured over the past 30 years in accidents involving airplanes flying into or out of King Cove, highlighted by the crash in 1981 of a medical evacuation flight that killed a nurse, patient, a helper and the pilot.

One of the factors included in the DEIS is an analysis of the "environmental justice" of this action. The National Congress of American Indians knows this action comes from Executive Order 12898 and is the requirement to address environmental justice in minority populations and low-income populations. This directive orders each Federal agency to "make achieving environmental justice part of its mission" which you do by "identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

The conclusion under the environmental justice heading in the DEIS is that a no road decision will have "no adverse affects" on the low-income and minority populations of King Cove. I strongly disagree with that finding in the draft impact statement. Surely King Cove residents' health has a high probability of greatly suffering if the decision by Secretary Salazar should find that the road is not in the public interest. It is surprising that the draft environmental impact statement doesn't say so as well.

Similarly, there is an adverse economic affect to King Cove's low-income and minority residents if this road is denied, as they are quite literally trapped, either because of the cost of the flight to Cold Bay that is out of their reach or because they can't risk that bad weather will prevent their timely return to jobs and families. The tribal members and residents of King Cove have waited decades for their moment of environmental justice, having been denied a full participation in the initial hearings on this land exchange. I sincerely hope they will not be ignored in this decision.

Congress was persuaded of the merits of King Cove's request for safe, reliable and affordable road transportation for its citizens, otherwise it wouldn't have passed the legislation that has required this DEIS. The federal government should take the next step and accept this unparalleled opportunity by approving the land exchange and adopting either alternative 2 or 3. This decision will bring invaluable new lands into the public domain and provide the most equitable solution for the Agdaagux and Belkofski tribe members and other residents of King Cove.

Further I need to comment that this bill is a strong plus for the regional environment. The exchange is bringing more than 60,000 acres of high quality habitat into the refuge, in return for a couple hundred acres of land needed to complete a road link around Cold Bay, on the bay side of the Izembek Lagoon. Having been to King Cove, and seen the honeycombed network of roads and trails that already exist around the bay, it is clear that this exchange will have no impact on waterfowl in the lagoon. But it will have a major impact on human health and safety for the future of King Cove residents.

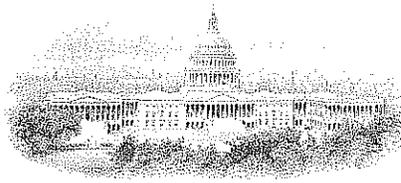
Again, as the sponsor of the bill which became law and provided for this EIS process it is a matter of personal pride that we have come this far. I ask that the Department finish the job. This struggle has been going on for decades. I fully support this land exchange. It is time to approve it and move on to the implementation of this important project.

Sincerely,



Lisa Murkowski  
United States Senator

**DON YOUNG**  
CONGRESSMAN FOR ALL ALASKA  
WASHINGTON OFFICE:  
2314 RAYBURN BUILDING  
WASHINGTON, DC 20515  
202-225-5765



Congress of the United States  
House of Representatives  
Washington, D.C. 20515

COMMITTEE ON  
NATURAL RESOURCES  
CHAIRMAN, SUBCOMMITTEE ON  
INDIAN AND ALASKA NATIVE AFFAIRS  
COMMITTEE ON  
TRANSPORTATION & INFRASTRUCTURE  
REPUBLICAN  
POLICY COMMITTEE

May 18, 2012

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

Dear Ms. Brady,

This letter provides comments to the US Fish and Wildlife Service on the Izembek Land Exchange Draft Environmental Impact Statement (DEIS). I fully support the selection of one of the two action alternatives, which will approve the land exchange and the construction and operation of a road between King Cove and Cold Bay.

The King Cove Group, which includes the Agdaagux and Belkofski Tribes, the City of King Cove, Aleutians East Borough, and King Cove Corporation, has expressed a preference for either DEIS alternatives two or three. I write in favor of selecting either of these alternatives

As I hope you appreciate, this issue truly is a matter of life and death for the Aleut residents of King Cove. Throughout my career in Congress, I have traveled extensively across Alaska and have become quite familiar with this area and the treacherous weather that occurs there year round. In that light, it came as no surprise when I heard that poor weather prevented your team from completing public meetings at False Pass and Nelson Lagoon, and that they were also forced to take a fishing boat back from King Cove to Cold Bay.

Having experienced this first-hand, the difficulties faced by the residents of King Cove and the need for a reliable access road should be evident. After all, a similar two and a half hour boat ride followed by a climb up a ladder to the Cold Bay dock is simply out of the question for anyone with a significant health issue, let alone an emergency condition. The residents of King Cove have waited decades for a dependable life-line, and it's my hope that this road will finally become a reality.

Evident through the passage of the legislation authorizing this transfer, it's clear that Congress was persuaded by the merits of King Cove's request for safe, reliable, and affordable road transportation for its citizens. Now, the Interior Department should take the next step and approve this land exchange by adopting either alternative two or

three. A favorable decision will bring valuable new lands into the public domain and provide the most equitable solution for the Agdaagux and Belkofski tribal members and other residents of King Cove.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Young". The signature is stylized and cursive, with a long, sweeping underline that extends to the right.

Don Young  
Congressman for All Alaska

## Testimony in support of the Road through the Izembek Wilderness

Good afternoon, my name is Della Trumble, I am thankful for this opportunity today to again testify in support of the road between King Cove and Cold Bay. As you are aware, I did testify at the scoping meetings in Anchorage and Washington D.C. in regard to this issue. Initially I was scheduled to travel with this group to all of the communities for the five remaining scoping meetings, however due to weather, was not able to get out of King Cove Monday morning. I have also lobbied and testified during the past decades as a shareholder and as the past President of the King Cove Corporation and as a member and past of the Agdaagux Tribe of King Cove. I have testified to the importance of safe access for the people in this community whether it was for travel in the case of health, emergencies, education, or just the peace of mind to travel between these communities. I have testified to the fact that the King Cove Corporation and the State of Alaska have given up so much in exchange for safe access 61,000 acres for a 208 acre easement. I have testified in regard to the disservices the government has done to the Aleut people by designating this wilderness without any consultation to the very people it affects the most.

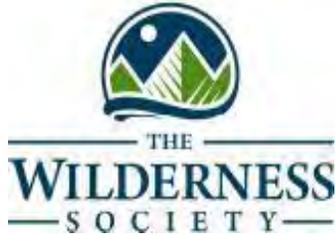
Over the years, I have watched and participated with many people from this community, some who are no longer alive today, as to the hardships they experienced while either trying to get to Cold Bay or while traveling in treacherous conditions while experiencing a medical emergency. Today these situations continue on a regular basis. When I returned from my trip from the scoping meetings, I talked to a young boy in Cold Bay who broke his leg on a Friday and due to weather, could not get out until Monday.

Today, I am testifying as a mother and resident of this community. As you may be aware, I was at the airport Monday afternoon waiting for the flight from Cold Bay as my daughter Trisha was on the plane. As I waited for the plane, I noticed the wind sock go in one direction, down, up in another direction, down, in a full circle. My thoughts were, cross winds and then became concerned. I watched the plane as it circled to come in for a landing, and from where I was parked it appeared it would land safely. As I backed up and turned the car toward the airfield, I saw the plane on the runway skidding sideways to a stop. I drove as fast as I could to get to the airplane to see if everyone was okay, at which time everyone was off of the plane. Another vehicle who was on the hydro road saw the plane as it hit a downdraft and hit the runway hard and then skidded, drove behind me and I sent them to call the Police Dept to let them know what happened. We got everyone to get their baggage from the plane off to the side as we could see fuel spewing from the plane.

Time and time again we talk about the weather and how fast it can change and in this case, the situation changed extremely fast. This was a situation that could have been very serious to everyone on the airplane and I am very thankful to God that it was not any worse than it was. I cannot even begin to imagine it being anymore than it was, this was bad enough. To watch a plane crash land with your daughter on it is not something any parent should witness, but again, I am very grateful everyone is safe. As we continue with this EIS process, please know that our families and fellow resident's welfare

and safety is of utmost importance to this community. How many times must we continue to go through this to make the government understand this is a way of life for us and it is not necessary. It is harder to comprehend since this situation was created without any consultation with this community. We have a solution that many other communities in Alaska do not have we have the ability for road access to the third largest airport in Alaska. Secretary, I ask that you take these testimonies today seriously and ask that you come to King Cove and Cold Bay to see firsthand what we have been experiencing firsthand for years. Please take these requests to heart prior to making a final decision as our lives do depend on it. Thank you.

Della Trumble  
PO Box 161  
King Cove, Ak 99612



May 17<sup>th</sup>, 2012

Stephanie Brady  
Project Team Leader  
U.S. Fish and Wildlife Service  
1011 East Tudor Rd., MS-231  
Anchorage, Alaska 99503  
[Izembek\\_eis@fws.gov](mailto:Izembek_eis@fws.gov)

**RE: Izembek National Wildlife Refuge DEIS**

Dear Ms. Stephanie Brady:

The Wilderness Society (TWS) contracted Center for Sustainable Economy (CSE) to review the U.S. Fish and Wildlife Service's (USFWS) proposed Izembek Land Exchange and Road Corridor Draft Environmental Impact Statement (DEIS) regarding professional standards for its economic analysis, discussion of economic issues, estimates of the likely magnitude of relevant benefits and costs for items that have sufficient public data sources available, and draw preliminary conclusions with respect to net public benefits, the benefit-cost ratio, and the project's public interest determination. The following comments are the results of this review and address issues associated with the socio-economic analysis and analysis the DEIS provides in support of the Department of Interior's public interest determination required by 43 CFR § 2200 et seq. and are submitted to the USFWS by The Wilderness Society and Center for Sustainable Economy. Additional comments on other aspects of the DEIS are being submitted under separate cover.

TWS and CSE have twice offered comments on this project during the pre-scoping phase (November 16<sup>th</sup>, 2009) and scoping phase (April 30<sup>th</sup>, 2010). They are incorporated here by reference in their entirety. In the context of those submissions, we made specific requests for FWS to conduct a proper benefit-cost analysis in support of the DEIS to establish the IRP's capability to deliver net public benefits. As we previously noted, and to cite one federal agency's definition, the term "net public benefits" is "[a]n expression used to signify the overall long term value to the nation of all outputs and positive effects (benefits) less all associated inputs and negative effects (costs)."<sup>1</sup> Demonstrating positive net public benefits is a prerequisite for determining whether or not a project is in the public interest. The manner in which federal

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<sup>1</sup> Forest Service Manual 1905: Planning, Zero Code Chapter, Definitions.

agencies establish whether or not a project generates net public benefits is through benefit-cost analysis (BCA) from the social perspective.

BCA is recommended as the basic litmus test for all federally funded or authorized infrastructure projects. For example, Executive Order 12893 (1994) applies to federal spending for infrastructure programs including direct spending and grants to states for transportation, water resources, energy, and environmental protection. The DEIS assumes that 100% of the road construction is funded by grants from the federal government.<sup>2</sup> EO 12893 requires a systematic consideration of benefits and costs, monetized to the maximum extent practicable. All types of benefits and costs, both market and non-market, should be considered. To implement EO 12893, the Federal Highway Administration (FHWA) has issued rules and guidance that requires use of BCA as well as life cycle cost analysis (LCCA) in project evaluations for federally funded road projects.<sup>3</sup> As FHWA notes, there are several situations for which BCA is recommended.<sup>4</sup> These include:

- Whether or not a project should be undertaken at all (i.e., whether the project's life-cycle benefits will exceed its costs).
- When a project should be undertaken. BCA may reveal that the project does not pass economic muster now, but would be worth pursuing 10 years from now due to projected regional traffic growth. If so, it would be prudent to take steps now to preserve the future project's right-of-way.
- Which among many competing alternatives and projects should be funded given a limited budget. BCA can be used to select from among design alternatives that yield different benefits (e.g., reconstruct a roadway with additional lanes versus no additional lanes); unrelated highway projects (a widened road versus an interchange on another road); and unrelated transportation projects in different transportation modes.

All of these considerations are in play with the IRP. Thus, it is clear that BCA is essential to a sound decision for the IRP. In addition, and as noted in our previous comments, a team of ex-Interior employees familiar with the project also supported a BCA.<sup>5</sup> Despite regulatory requirements and our repeated requests, the DEIS does not contain or incorporate a formal BCA as contemplated by CEQ regulations implementing NEPA.<sup>6</sup> Instead, the discussion of individual costs and benefits is scattered throughout multiple sections of the DEIS, not quantified in a rigorous manner, and not tallied together so the decision maker has a sense of the net impact. For example, while road construction and maintenance costs are alluded to in Sections 2 and 4 of the DEIS, they are not directly compared with benefits. Cost estimates do not conform to FHWA standards. In fact, the DEIS acknowledges that LCCA was rejected as an alternative evaluation criteria.<sup>7</sup>

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<sup>2</sup> DEIS at 4-181.

<sup>3</sup> Federal Highway Administration, Final Policy Statement on Life Cycle Cost Analysis. FHWA Docket No. 94-15. September 18<sup>th</sup>, 1996.

<sup>4</sup> See FHWA's Economic Analysis Primer, Section on Benefit-Cost Analysis, viewable at: <http://www.fhwa.dot.gov/infrastructure/asstgmt/primer05.cfm>.

<sup>5</sup> <http://www.refugewatch.org/2009/09/29/former-doi-officials-oppose-izembek-nwr-land-swap/>.

<sup>6</sup> NEPA regulations do not require a formal BCA. However, to the extent that BCA is essential to an informed decision the regulations go on to prescribe the manner that BCA should be incorporated into an EIS. See 40 CFR §1502.23.

<sup>7</sup> DEIS at 2-4.

Regrettably, failure to properly evaluate benefits and costs introduces a serious bias into the analysis. Congressional legislation passed in 2009, P.L. 111-11, the Omnibus Public Land Management Act Legislation, directed the FWS to analyze this road proposal and land exchange in Izembek National Wildlife Refuge, and for the Secretary of the Interior to determine whether or not the proposed road is in the “public interest.” In order to fulfill the terms of the legislation, a proper BCA is necessary, as it is crucial for determining whether or not the proposed action is in the public interest and represents a good balance between competing resource values (i.e. benefits exceed costs), creates demonstrable rather than speculative socio-economic benefits, and rests on a solid economic foundation. FWS’s failure to conduct and incorporate a BCA into the DEIS has thus led the agency to erroneously conclude that the project is beneficial from an economic standpoint. A cursory examination of benefits and costs indicate, however, that costs are likely to exceed benefits by a huge margin – a factor of 7 in the most optimistic scenario, a factor of 13 more likely. The following section presents these figures in the context of a preliminary BCA commissioned by TWS and completed by CSE based on information presented in the DEIS as well as other publically available sources of information.

### Preliminary Assessment of Benefits and Costs

Benefit-cost analysis (BCA) compares the present value of the social benefits of a public policy, program, or project against the present value of social costs. There are two fundamental results from performing a benefit-cost analysis: 1) net present value (NPV); and 2) benefit-cost ratio.<sup>8</sup> The “present worth” of a project is commonly referred to as its NPV. The standard criterion for deciding whether a government policy, program, or project can be justified on economic principles is net present value – the discounted monetized value of expected net benefits (i.e., benefits minus costs).<sup>9</sup> NPV is a measure of the absolute magnitude of the gain or loss to society.

As described by the Office of Management and Budget (OMB), net present value is computed by assigning monetary values to all benefits and costs – regardless of who enjoys or incurs them – discounting future benefits and costs using an appropriate discount rate, and subtracting the sum total of discounted costs from the sum total of discounted benefits. Discounting benefits and costs transforms gains and losses occurring in different time periods to a common unit of measurement. Importantly, “[p]rograms with positive net present value increase social resources and are generally preferred. Programs with negative net present value should generally be avoided.” Stated more precisely, projects that attain an NPV greater than 0 are worth investing in – the benefits over time outweigh the costs over the life of the project.<sup>10</sup>

To provide a ballpark estimate of what FWS may find after it completes a BCA for the IRP that is consistent with federal standards and guidelines, we followed standard procedures articulated by the Office of Management and Budget, Executive Order 12893, and FHWA guidance. We first developed NPV and BCR estimates for Alternatives 2 and 3 based solely on information presented in the DEIS as our baseline. We then modified the analysis to conform more closely with federal BCA guidance and by taking into account factors overlooked by the DEIS.

### *Baseline estimates of net present value and the benefit-cost ratio*

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<sup>8</sup> Office of the Secretary of Transportation (DOT). 2006. Guide to Quantifying the Economic Impacts of Federal Investments in Large-Scale Freight Transportation Projects. Washington, D.C.: Department of Transportation.

<sup>9</sup> Office of Management and Budget (OMB), Circular A-94 (Revised), Section 5(a). Available at: <http://www.whitehouse.gov/omb/circulars/a094/a094.html>.

<sup>10</sup> DOT. 2006. Note 14, Section 7.2.

The DEIS makes reference to five categories of socio-economic effects associated with the project: (1) travel costs; (2) employment opportunities; (3) induced economic activity; (4) local government finance and (5) changes in both public and subsistence uses.<sup>11</sup> Of these, employment and induced economic activity are beyond the scope of BCA because they are instead addressed in regional economic impact models.<sup>12</sup> For category 4 – local government finance – the purported benefits of the IRP is a \$1 million per year savings to the Aleutians East Borough associated with termination of its annual subsidy for hovercraft operations.<sup>13</sup> However, the Aleutians East Borough has already terminated hovercraft service and has stated that it has no plans to resume service in the foreseeable future<sup>14</sup> and so this effect would not be causally related to the road should it be constructed and is thus inappropriate for consideration in a BCA that is designed to address incremental impacts of the road.

As for category 5 – changes in public and subsistence use – the DEIS makes it clear that there are both negative and positive effects to consider. For example, long-term negative effects on subsistence could include displacement of subsistence resources available in concentrated subsistence use areas for caribou and waterfowl, reduced availability of resources for harvest, and increased competition for resources.<sup>15</sup> Positive effects may include increases in public use of lands deeded to the National Wildlife Refuge that are currently in the private domain: In particular, “[m]otorized and non-motorized hunting and recreational activities by shareholders and by permitted non-shareholders would change to open access to the general public for waterfowl and game hunting, trapping, fishing, and recreational activities without a fee.”<sup>16</sup> Because the DEIS does not make any conclusions with respect to the net effect (i.e. whether the harm to subsistence is offset by increases in public use elsewhere) in terms of appropriate use metrics such as visits and annual yield of game, fish, and native plant resources we assume for purpose of the preliminary BCA that the effects cancel out. This leaves effects on travel costs as the sole benefit appropriate for consideration in a BCA.

With respect to travel costs, the DEIS concludes that four key economic groups would benefit from the IRP under Alternatives 2 and 3: (1) Peter Pan Seafoods fish processing crews; (2) managers and technicians for Peter Pan Seafoods; (3) fishing crew members and fishery observers, and (4) residents and other persons not associated with fisheries. Taking various modal changes into account and the travel cost differentials reported in Table 4.2.3-9 of the DEIS FWS concludes that annual savings that would accrue to each group would amount to \$180,546, \$4,013, \$2,268, and \$74,754 respectively for groups 1-4. The DEIS also assumes that this level of benefit would rise over time as overall use increases. Taking this into account and using standard discounting procedures we estimate that these travel cost savings will amount to \$5,453,206 in present value benefits over the 35 year analysis period for Alternative 2 and \$5,348,295 for Alternative 3. Table 1 provides detailed present value benefit estimates by key economic group.

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<sup>11</sup> DEIS Sections 4.3.3.2; 4.3.3.6; 4.3.3.7, 4.4.3.2; 4.4.3.6; 4.4.3.7.

<sup>12</sup> The reason for this is that employment and economic activity are usually merely transfers of resources – a gain is offset by corresponding decreases in competing uses.

<sup>13</sup> DEIS at 4-78; 4-188; 4-264.

<sup>14</sup> DEIS at 4-10

<sup>15</sup> DEIS at 4-202.

<sup>16</sup> DEIS at 4-200.

**Table 1**  
**Preliminary Benefit – Cost Evaluation for the Izembek Road Project**

	DEIS Baseline		Corrected and Adjusted	
	Alternative 2	Alternative 3	Alternative 2	Alternative 3
<b>PV Benefits through 2048</b>				
Travel savings processing crew	\$3,763,861	\$3,722,181	\$3,464,464	\$3,384,563
Travel savings processing managers	\$83,659	\$81,743	-\$9,174	-\$17,080.38
Travel savings fishing crew	\$47,281	\$45,551	\$31,263	\$27,487
Travel savings residents	\$1,558,404	\$1,498,821	\$762,187	\$651,234
<i>Present value benefits (35 years)</i>	\$5,453,206	\$5,348,295	\$4,156,754	\$4,046,205
<b>PV Costs through 2048</b>				
Capital costs and construction	\$34,352,541	\$37,671,628	\$30,122,435	\$35,580,036
Operations and maintenance	\$3,201,595	\$3,394,981	\$4,490,566	\$5,315,364
Mitigation	-	-	\$10,152,515	\$10,695,748
Lost passive use values	-	-	\$1,157,473	\$1,307,196
Additional public management costs	-	-	\$943,074	\$943,074
<i>Present value costs (35 years)</i>	\$37,554,136	\$41,066,609	\$46,866,063	\$53,841,418
Net present value	-\$32,100,930	-\$35,718,314	-\$42,709,308	-\$49,795,212
Benefit-cost ratio	0.1452	0.1302	0.0887	0.0751

With respect to costs, the DEIS provides estimates of two: (1) construction costs, and (2) long term annual operations and maintenance costs. For Alternative 2, initial road construction costs are estimated to be \$20.7 million. Annual costs are expected to be \$149,000. For Alternative 3, initial construction costs are estimated to be \$22.7 million with annual costs at \$158,000. Using standard “two stage” discounting procedures endorsed by federal agencies that account for the opportunity cost of capital these translate into \$37,554,136 in present value costs over the 35 year analysis period for Alternative 2 and \$41,066,609 for Alternative 3 (Table 1).<sup>17</sup> Subtracting costs from benefits indicates a net present value (NPV) for Alternative 2 of -\$32,100,930 for Alternative 2 and -\$35,718,314 for Alternative 3. Dividing benefits by costs indicates a benefit-cost ratio of 0.1452 for Alternative 2 and 0.1302 for Alternative 3. In other words, taking the DEIS benefit estimates at face value, costs of the Izembek Road Project likely exceed benefits by a factor of 7 in the most optimistic scenario.

Clearly, a negative NPV and extremely low BCR for either Alternative suggest that the IRP cannot meet key economic factors for a public interest determination by the Secretary of Interior. Among other factors, the Secretary must find that land exchanges help “meet the needs of State and local residents and their economies” and otherwise do not result in resource values being diminished.<sup>18</sup> By causing more economic harm than good, the IRP fails these tests. Nor can the project be justified as a use of federal highway funds. As previously noted, FHWA policy does not endorse projects whose life cycle costs exceed benefits. By factoring in corrections to the

<sup>17</sup> EPA provides a useful overview of the two stage discounting procedure at: <http://www.epa.gov/ttnecas1/econdata/Rmanual2/8.3.html>. For the purpose of our analysis and in accordance with EPA’s guidance, we set the opportunity cost of capital at 7% and the consumption rate of interest (discount rate) at 3%.

<sup>18</sup> 40 CFR § 2200.0-6(b) and (b)1.

DEIS assumptions and overlooked categories of cost, the economic case becomes even more compelling.

*Adjusted estimates of net present value and the benefit-cost ratio*

By factoring in corrections to the DEIS assumptions and overlooked categories of cost, the economic case becomes even more compelling. In our technical review of the economic benefit and cost figures reported in the DEIS we found the following five deficiencies that warrant adjustment to the baseline NPV and BCR calculations we presented above. These include:

- With respect to benefits, the DEIS fails to include the opportunity costs of time associated with longer trip lengths.
- Capital or construction costs do not reflect the opportunity costs of capital or costs associated with non-local gravel sources.
- Annual operations and maintenance costs do not include treatments for dust palliative and do not conform with published Alaska DOT estimates.
- The DEIS does not address mitigation costs associated with wetlands and construction of bollard-chain road barriers.
- The DEIS fails to account for passive use damages associated with development of presently intact and valuable wilderness lands.
- The DEIS fails to account for increased federal management costs.

To adjust benefit calculations, we used standard BCA procedures to account for the opportunity costs of time. One standard method is to assume that an individual's hourly wage is a proxy for the value of his or her time spent working or at leisure rather than commuting.<sup>19</sup> For each user group, we calculated the additional time that would be needed to complete a single round trip using the road rather than the preferred existing mode, multiplied this figure by average wage rates for that group, and then multiplied the product by the number of annual trips assumed by the DEIS. Time differentials were taken from Table 4.2.3-9 of the DEIS. Average wages were taken from the Alaska Department of Labor and Workforce Development.<sup>20</sup> For residents, the average wage figure was derived from the American Community Survey data for the Aleutians East Borough in conjunction with ADLWD data.<sup>21</sup> The resulting annual opportunity cost figure was then deducted from the travel cost savings benefit figures reported in the baseline scenario. Present value benefit figures were then re-calculated over the 35-year analysis period. The results are presented in Table 1. As a result of this adjustment, present value benefits are reduced to \$4,156,754 in Alternative 2 and \$4,046,205 in Alternative 3.

With respect to construction costs, we first revisited the DEIS's initial construction cost estimates of \$20.7 and \$22.7 million since sources for these estimates were not disclosed. To corroborate, we found transferable estimates from a study of Nanek Crossing and used these figures in a revised calculation. That study estimated gravel road construction costs of roughly \$650,000 per mile (in 2012 dollars) considerably less than the \$1 million per mile assumed by the DEIS.<sup>22</sup> To be conservative, we adopted this lower figure. Bridge costs add another

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<sup>19</sup> Boardman, Anthony, David Greenberg, Aidan Vining and David L. Weimer. 2001. *Cost-Benefit Analysis – Concepts and Practice*. Upper Saddle River, NJ: Prentice Hall.

<sup>20</sup> <http://live.laborstats.alaska.gov/wage/index.cfm?at=70&a=200002>.

<sup>21</sup> Relevant American Community Survey data can be found at:

<http://live.laborstats.alaska.gov/cen/acsdetails.cfm?l=13&ay=20105&an=Aleutians+East+Borough&ds=07#C24010>.

<sup>22</sup> Alaska Department of Transportation. 2005. *Naknek Crossing Intermodal Economic and Airport Use Study*

\$250,000, also based on the same study. In addition, given FWS's assertion that local gravel sources will not be made available, we incorporated an additional \$2 million in costs for Alternative 2 and roughly \$2.4 million for Alternative 3 based on DEIS figures. As with the baseline estimate, we then followed standard procedures for annualizing these costs over the 35-year analysis period using an opportunity cost of capital of 7% as recommended by EPA procedures. Factoring in the opportunity cost of capital is important because it reflects what the initial investment could have earned in other settings. The DEIS does not do this, and only presents initial construction costs. Our revised present value construction and capital costs estimates are \$30,122,435 for Alternative 2 and \$35,580,036 for Alternative 3 – somewhat lower than the baseline, but much greater than the costs implied by the DEIS.

In terms of annual operations and maintenance costs associated with the IRP, the Alaska Department of Transportation notes three important categories relevant to gravel roads in this region: (a) resurfacing; (b) snow and ice removal, and (c) dust palliative. Resurfacing is assumed necessary every 10 years, and dust palliative treatments every 2. Snow and ice removal is annual, but varies considerably depending on climate conditions. With respect to costs, DOT estimates we incorporated updated to 2012 dollars are \$811.97 per linear mile per year for resurfacing, \$2,165 per linear mile per year for dust palliative, and \$5,553 per linear mile per year for all other routine maintenance including snow and ice removal.<sup>23</sup> Present value costs over the 35 year analysis period amount to \$4,490,566 for Alternative 2 and \$5,315,364 for Alternative 3, considerably greater than the baseline figures based on DEIS estimates. From discussions in the DEIS, the main source of discrepancy appears to be the costs of dust palliative, which are not discussed.

An additional cost consideration is the costs of road maintenance equipment. These also appear to be underestimated, not accounting for the likely need for additional equipment, the lifespan and costs associated for acquisition, maintenance, and replacement. Although we have not attempted to quantify these costs here, we recommend that the cost estimates for Alternatives 2 and 3 be modified to reflect these costs.

Another cost element not disclosed in the DEIS relates to costs incurred by Peter Pan. The assumption that a Peter Pan sport utility vehicle would not use the road, as stated in the DEIS (DEIS at 4-65) is impracticable. If Peter Pan is willing to load an SUV on a hovercraft or ferry, it is reasonable to assume that the company would use it on the road for transportation of managers, invited guests, contractors, workers, etc. As the largest seafood processor in Alaska, Peter Pan has relatively high reported revenues, and it is unlikely that the cost of driving an SUV or other commercial vehicles would serve as a deterrent. Thus, the costs of ground travel for this vehicle should be included in the analysis of these costs.

Another important category of cost missing from DEIS discussions is the cost of mitigation. There are at least two major components. First, is the cost of mitigating off-road access. A barrier installed along the length of the roadway on both sides will be used to prevent vehicles from accessing the Izembek National Wildlife Refuge and Izembek Wilderness lands adjacent to

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An approved component of the Alaska Statewide Transportation Plan. Juneau: Alaska DOT.

<sup>23</sup> For dust palliative and resurfacing, see Kemplen, Alan. Area Planner, DOT&PF. Fax memorandum. October 2, 2003. Also cited in ADOT (2005); For all other annual costs see: Alaska Department of Transportation and Public Facilities. 2008. Let's Get Moving 2030. Technical Appendix System Level Needs Analysis and Finance Analysis. Juneau: Alaska DOT.

the road.<sup>24</sup> Two barrier types are being considered for this project: a chain barrier and a bollard barrier.<sup>25</sup> Either involves a significant expense. Values reported in the literature suggest a cost of \$310,339 per mile (an average between costs of the two design options).<sup>26</sup> The second mitigation cost is associated with wetlands. Alternative 2 would involve the fill of 3.8 wetland acres, 2.4 for Alternative 3. In a study of the wetland mitigation costs for the proposed Chuitna Coal mine, along Cook Inlet, we developed an estimate of \$163,891 per acre based on what the mine developer would likely have to pay into a regional wetland bank to compensate for the fills.<sup>27</sup> This is the standard in-lieu mitigation cost fee for placing an acre of fill into REV1 class wetlands similar to what exist in the IRP area. There is no reason why the Aleutians East Borough would be exempt from this requirement. Multiplying these unit costs of mitigation by road miles and wetland acres filled, annualizing both barrier and wetland cost over the life of the project and then discounting yields a present value cost estimate of \$10,152,515 for Alternative 2 and \$10,695,748 for Alternative 3.

Another cost element omitted from the DEIS is the loss of passive use values associated with the conversion of pristine wilderness and refuge land into a road corridor. As discussed in depth in our previous comments, passive use values represent individual's willingness to pay for protecting a resource, even if they may never use it in any way. With respect to wildlife, people are clearly willing to pay to protect species – some of them halfway around the world – that they may never even view. Contributions to international wildlife organizations are an example of how that willingness to pay is manifested. Passive use values for Alaska's wilderness lands, wildlife refuges, and other intact landscapes extend to the entire U.S. population. For example, in Colt (2001) suggested that passive use values for 13.2 million acres encompassed by Bristol Bay Wildlife Refuges was in the order of \$2.5 billion a year, or \$3.5 billion in current dollars. This translates into a value of \$268 dollars an acre each year.<sup>28</sup> By applying this figure to the 201 acres of road corridor lands developed in Alternative 2 and 227 acres in Alternative 3 and then discounting the resulting cost stream over the 35-year analysis period we estimate passive use damages to represent a present value cost of \$1,157,473 for Alternative 2 and \$1,307,196 for Alternative 3. This likely represents a conservative estimate as impacts to wilderness will extend far beyond the direct impacts of the road corridor.

A final cost category not quantified in the DEIS are the increased costs associated with management of lands added to the public domain. Planning, monitoring, and enforcement are examples of routine costs associated with management of public lands for either federal or state agencies. Nationally, for the wildlife refuge system as a whole, these costs amount to roughly \$3.40 per acre based on the most recent budget justification prepared by FWS.<sup>29</sup> Applying this

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<sup>24</sup> The DEIS does not disclose whether the initial construction cost estimates include this amount. Given the difference between the construction cost estimate of AKDOT (\$650k/mile) and the DEIS (\$1 million/ mile) they may. Either way, it does not affect our alternative assessment since we begin with the former and then add in barrier costs separately.

<sup>25</sup> DEIS at 2-25 and 2-26.

<sup>26</sup> Sonoma Ecology Center. 2003. Fencing Guidelines and Specifications for Conservation Easements. Sonoma, CA: Sonoma County Agricultural Preservation District; Department of Defense. 2010. Unified Facilities Criteria. Selection and Application of Vehicle Barriers.

<sup>27</sup> Talberth, John and Evan Branosky. 2011. Net Public Benefits Analysis of the Chuitna Coal Mine.

<sup>28</sup> Colt, Steve. 2001. The Economic Importance of Healthy Alaska Ecosystems. Anchorage: Institute for Social and Economic Research, University of Alaska.

<sup>29</sup> USFWS. 2013. Budget Justification for FY 2013. Washington, D.C.: U.S. Department of the Interior, Fish and Wildlife Service.

cost to just the private lands being added to the FWS refuge system implies an additional public cost of \$943,074 over the 35 year analysis period in present value terms.

Taken together, these adjustments to the baseline BCA significantly worsen the overall economics of the project. NPV falls to -\$42,709,308 for Alternative 2 and -\$49,795,212 for Alternative 3. Respectively, these represent a BCR of 0.0887 and 0.0751. In other words, in a more credible assessment of benefits and costs than those included in the baseline, costs are likely to exceed benefits by a factor of 13.

While these benefit-cost estimates are preliminary, they nonetheless suggest that if FWS were to conduct a proper BCA in the context of the final environmental impact statement the agency would find that the IRP could not be justified on economic grounds taking into consideration the benefits to key economic user groups and all relevant market and non-market costs. As such, key economic criteria associated with the Secretary's public interest determination cannot be met. We look forward to working with FWS to incorporate this critical information into the FEIS. Feel free to contact either one of us if you need clarification on any aspect of these comments.

Sincerely,



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Comment on the DEIS for a Land Exchange/Road Corridor in the Izembek National Wildlife Refuge

Anchorage, Alaska

May 3, 2012

By Dan Rowley P.E.

Good evening. For the record my name is Dan Rowley. I am a professional civil engineer and I work for the Aleutians East Borough. In that role I have been associated with the City of King Cove and the project which is the subject of this hearing for over 12 years. I have probably walked between King Cove and Cold Bay an equivalent of at least three times managing topographic field surveys, drainage and subsurface investigations and developing the preliminary and final engineering documents. I know many of the bears out there on a first name basis.

I just would like to comment on just one engineering aspect of this DEIS. That is the assumption of a constant 100-foot wide corridor width for either of the two road alternatives. The Borough and the City have repeatedly commented to the USFWS that the 100-foot width should be stated as an average width and that the corridor width could range up or down depending on the width of the road footprint. Having a variable corridor width is a common highway engineering practice in establishing a road corridor through rolling or hilly terrain. To date the USFWS has not accepted this recommendation nor has any reason been offered. The fact is that a variable width corridor could end up resulting in less acreage than a constant 100-foot wide corridor which aligns with what the Act requires.

Rigidly confining a road to a 100-foot wide corridor greatly limits excavation depths and embankment widths. That constriction greatly limits the ability to balance cut and fill volumes and, in turn, leads to having to utilize offsite borrow pits. The preliminary engineering design that is included in this DEIS does conclude that there will have to be substantial offsite borrow to construct the road and that, with one limited exception, offsite borrow sources do not exist in the project area. It will greatly raise the construction costs to have to import borrow material. This approach is at odds with standard road design practice and is believed to be totally unnecessary if one accepts the premise that roadway excavation could likely provide the majority of material needed to construct roadway embankments.

Lastly, a fixed and restricted 100-foot wide corridor width can become a major impediment if the road needs to be realigned to avoid an unforeseen cultural resource site, to improve a stream crossing location or to avoid an unforeseen bad foundation condition. It also greatly constricts the construction contractors operations where large earthmoving vehicles require large turning radiuses.

The Borough and City would once again request that the FEIS consider our recommendation and cite the 100-foot corridor width as an "average" width that can be adjusted up or down as dictated by the final engineering design.

May 11, 2012

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

Re: Izembek National Wildlife Refuge Land Exchange/Road Corridor  
Request for Public Comment  
Support for King Cove & Alternative #2

Dear Ms. Brady,

My husband and I are writing to you as former residents from the community of King Cove, Alaska. I was raised in King Cove and my husband moved there from a neighboring community and we moved soon after completing high school to raise our family and now live in Anchorage. We still have many friends and family members that live in King Cove and visit on occasion, so this road corridor is very important to us, as those we love and know very well are impacted by the outcome. This will ensure that the next generation will enjoy better lives than those of us before them, without the stresses of travel that so many people across the nation take for granted. We find it interesting that in any other place in this country where a road such as this is possible and very much so needed, it would have been done by now. But our community has to go to these lengths to even have it considered. Fortunately our elder teachings included a talent for patience, an ability to live in harmony with the land, a desire to give as good as we get.

For decades we have been lobbying our government for the right to build a single lane gravel road to the all-weather airport in Cold Bay, Alaska. This road will traverse the Izembek National Wildlife Refuge, a huge swath of land in our backyard that was designated "wilderness." This decision, made decades ago, severely restricted our use and access to the land. Residents of King Cove were largely excluded from this land-use decision – just one in a long string of failures by our federal government to solicit and value the input of indigenous people on the use of their ancestral lands. Sad to say that the first that many of us knew about this government action was when we found our subsistence cabins burned to the ground in the 1970's.

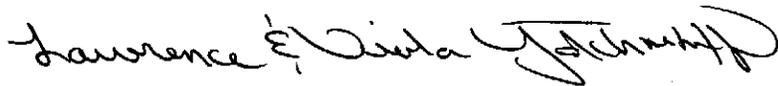
And so for more than twenty years, we have battled for a single-lane gravel road for our community. After decades of effort and expense, Congress passed the Izembek National Wildlife Refuge Land Exchange Act (2009) and now a draft Environmental Impact Statement ("DEIS"), as required under the Act, is out for public comment. Significantly played down in the EIS, is

the value of our unprecedented land exchange which proposes to transfer more than 56,000 acres of pristine land from the King Cove Corporation and the State of Alaska to the federal government. More than 45,000 acres of this land exchange will be designated as *new* wilderness. We find no other examples of such a generous exchange, particularly when considering that all we ask in return is 206 acres of land on which to construct a one-lane gravel road. This small road will be the missing transportation link connecting King Cove to the Cold Bay Airport. As noted by Dean Gould, President of the King Cove Corporation, "We are willing to give back to the federal government about 20% of the lands that same government gave us to settle aboriginal land rights as part of the Alaska Native Claims Settlement Act. That speaks highly to the importance of this issue to our people and to their health, safety and well-being."

Because we have lost too many lives already from not being able to drive to the airport in Cold Bay during medical emergencies, we must do whatever we can to ensure the safety and well being of our families, while at the same time letting the voices of our elders speak through us. So we come to the table, with deeds to valuable wetlands<sup>1</sup> in our outstretched hands. We come pledging to be patient but persistent. We come willing to make concessions, like the fact that the road will never be used commercially or like our agreement to cooperate on temporary road closures as necessary to ensure minimum disruption to wildlife. We hope that this is truly our moment and that finally our voices will prevail.

As Aleuts, we know truly common ground when we see it. It looks like the Izembek National Wildlife Refuge and the acres that we propose to add to it. As tribal members, we know what trust and responsibility look like. They look like a government ready to make something that was wrong yesterday, right today. And our sincerest hope is that this time we just might persuade our government that a road to Cold Bay is not only in the public interest, it is the only right and smart and fair thing to do. Thank you for your time.

Sincerely,



Lawrence and Viola Yatchmeneff  
8011 E. 20<sup>th</sup> Avenue  
Anchorage, AK 99504

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<sup>1</sup> Alternative 2 will result in the net increase of 13,563 acres of unique and high value wetlands (a ratio of 1:1,043 acres for the 13 acres transferred, or 1:3,563 acres for the 3.8 acres of wetland fill).

Californians for  
Western Wilderness  
<[info@caluwild.org](mailto:info@caluwild.org)>

To [izembek\\_eis@fws.gov](mailto:izembek_eis@fws.gov)

cc

05/18/2012 04:51 PM

Subject Comments on the DEIS for the Izembek NWR  
Proposed Land Exchange and Road Corridor

May 18, 2012

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

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

Comments by Californians from Western Wilderness on the DEIS for the Izembek  
NWR Proposed Land Exchange and Road Corridor

Dear Ms. Brady:

I am writing on behalf of the more than 835 members and supporters of Californians for Western Wilderness (CalUWild), an unincorporated citizens organization dedicated to encouraging and facilitating citizen participation in legislative and administrative actions affecting wilderness and other public lands in the West. Our members use and enjoy the public lands all over the West.

We urge in the strongest possible terms that the U.S. Fish & Wildlife Service adopt the No Action Alternative for the proposed land exchange and road project.

We have been following this issue for as long as it has been discussed, and there are many reasons why this road should not be built. The proposal is bad or unnecessary from several points of view: environmental/ecological, wilderness policy, public safety, and budgetary. Any one of these is sufficient ground to adopt the No Action Alternative. Taken together, they form an extremely strong case against the proposal.

### **Environmental/Ecological**

The road would be built on the isthmus that separates Izembek Lagoon and Cold Bay. It is a well-known fact that roads fragment habitat and cause other environmental disturbances, such as pollution from exhaust and vehicle fluids (gasoline, motor oil, brake fluid, anti-freeze), vehicle rubber dust contamination, erosion, etc., regardless of

how well they are constructed. The waters of the Lagoon and Bay are important for the Pacific Flyway. The Pacific Brant and many other species of birds rely on the waters there. The Lagoon is home to the largest eel grass beds in the Pacific.

A road here is simply not acceptable.

### **Wilderness Policy**

Izembek NWR is a designated portion of the National Wilderness Preservation System. A land exchange to allow the construction of the road would gut the wilderness area.

De-designating land for exchange would set a very bad precedent for the Wilderness Preservation System, simply from a policy standpoint. We do not want legislators and communities to feel that they can exchange away lands that were important enough to be included in legislation that was passed by Congress, whenever some perceived need arises. That defeats the purpose of the Wilderness Act of 1964, which meant to give permanent protection to wilderness areas.

In addition, the lands proposed to be exchanged for the isthmus are not nearly as significant.

A road here is simply not acceptable.

### **Public Safety**

The local community and Alaska politicians have tried to make this an issue of public safety and access to the community of King Cove. The fact is that Congress addressed these issues in the Omnibus Act of 1999. Ferry and hydrofoil service has proved to be more than adequate; in fact they are faster than the proposed road would be.

A road here is simply not necessary.

### **Budget**

The road is estimated to cost \$1.73 Million per mile. In a time of budgetary constraint, there are better uses for that money. This cost does not include ongoing maintenance over the expected life of the road.

A road here is simply not acceptable.

Again, Californians for Western Wilderness urges you to adopt the No Action Alternative.

Thank you for the opportunity to comment, please let us know of your decision in this matter, and please keep us informed of opportunities for future involvement on this issue.

Respectfully submitted,

Michael J. Painter  
Coordinator

Californians for Western Wilderness  
P.O. Box 210474  
San Francisco, CA 94121  
415-752-3911



May 15, 2012  
1725 East 24<sup>th</sup>  
Anchorage, Alaska  
99508

Ms. Stephanie Brady, Team Leader, Izembek Road  
US Fish and Wildlife Service

Dear Ms. Brady:

I am enclosing my previous testimonies on this issue, one which should have been concluded several years ago following several supposedly binding agreements. My comments, my experience, and my observations as the past Eastern Aleutian Medical Director for the US Public Health Service, have not altered. Recent developments have reinforced my position.

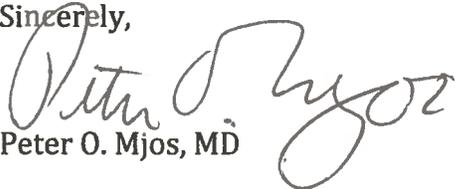
A recent winter storm with sustained winds greater than 100 knots demolished the Lenarts Harbor hovercraft hangar, to no one's surprise. These hurricane force storms are not infrequent, of course. No vehicle, boat, plane or medevac can even consider travel in such horrific conditions. Combined with darkness, avalanche conditions, and ice-glazed roads, an attempt to travel the proposed road would be foolish beyond any reason, regardless the emergency or business. Any attempt to maintain the road for travel in such conditions would clearly jeopardize life.

The cost to maintain the proposed road, estimated to be hugely expensive, would fall to which entity-the Alaska DOT, the King Cove Corporation, the Eastern Aleutian Borough, or the Aleut Corporation? Are any able or willing to shoulder the cost and responsibility?

The King Cove Clinic is decidedly better equipped and staffed to handle emergencies than the Cold Bay clinic, and is far better suited than Cold Bay to maintain an emergency in holding while awaiting air transport.

I must repeat my contention that if the honest desire by the community of King Cove is for the safest medevac model it would be via US Coast Guard helicopter, preferably stationed in Cold Bay, and which would then also serve and provide cover for the greater Peninsula. The other option, frequently and successfully utilized for medical transport, is by any of the several large and seaworthy crab vessels moored in King Cove. The US Coast Guard must acknowledge that such transport is necessary , safe, efficacious and infallible.

Sincerely,

  
Peter O. Mjos, MD





October 30, 2007  
1725 East 24<sup>th</sup>  
Anchorage, Alaska  
99058

Representative Nick Rahall  
Chairman, House Natural Resources Committee

Dear Mr. Rahall:

I wish to comment on the King Cove, Alaska, road proposal before your committee. This will be my third official comment on this issue. A copy of my second testimony is enclosed.

Not much has changed since I first opposed this issue primarily on safety issues. First, what has changed is that, despite Congress' initial overruling the construction of the road-at-issue, road construction was begun and has continued. Second, that the hovercraft, which I predicted could not operate in most Cold Bay conditions, indeed cannot operate in most Cold Bay weather and seas. Moreover, as predicted, the costs of operation and maintenance have quickly proven unmanageable. Third, a new element has been introduced-that trucking fish to Cold Bay Airport will enhance marketability and price. Since no scheduled, large capacity airlines serve Cold Bay, and that the distances from Seattle, the target market, are greater than other closer, more accessible and high quality fisheries, and that King Cove is currently served as often as necessary by high volume ocean-going fish packers and processors, this argument seems unrealistic, if not disingenuous, at best.

What has not changed: not infrequent hurricane-force meteoric conditions where opposing Bering Sea and North Pacific currents collide in the Cradle of the Storms. For a successful medivac, the common denominator is that the weather at the Cold Bay Airport must allow a medivac plane to land and takeoff. Unfortunately, conditions often do not permit aircraft entrée to Cold Bay Airport, making the issue of access moot. Unless situations have changed since I was Medical Director for Eastern Aleutian Tribes and physician to King Cove and Cold Bay, the new, very well equipped clinic in King Cove, constructed, incidentally, with federal dollars given in lieu of denying the construction of this very road which we today discuss, is better staffed -two or three community health aides and two midlevels (nurse practitioners and/or physician assistants) than is Cold Bay. Transporting critically ill patients to Cold Bay should not be attempted unless conditions seem likely to permit medivac arrival and departure. Finally, my great fear is that the proposed road poses a cornucopia of scenarios for catastrophe, including zero visibility in league with hundred-plus mile per hour maelstroms with black ice, impossible traction and steerage, devoid of any shelter, and impenetrable drifts, possibly combined with avalanches.

In those scenarios rescue becomes, if not impossible, then gravely threatening the lives of would-be rescuers. Then there is the cost of routine maintenance, always projected to be well beyond current or foreseeable budgeting.

As I have stated in the past, there is always available in King Cove at least one, and usually several crab boats or the equivalent which can make the transport to Cold Bay

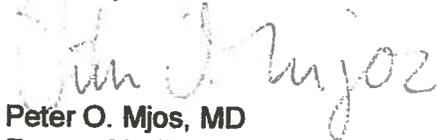
safely in two to three hours in the very worst conditions, conditions in which no plane can even consider touching down at Cold Bay. I have personally conducted several such over-ocean medivac escorts. The difficulty is that off-loading from a heaving boat onto vertical steps at the Cold Bay dock is not only very tricky, but also potentially catastrophic, more so if one is injured or immobilized. I have proposed and would continue to advocate that a year-round breakwater and dock be constructed in Cold Bay one which would allow safe and protected exit and boarding from aboard ship. Also necessary is Coast Guard blessing, certification, and support of transporting passengers by private and unlicensed vessels in emergencies, a necessary and frequent event which the Coast Guard currently does not endorse, much less encourage.

The other opportunity, which would serve several like purposes, would be to station a US Coast Guard helicopter squadron at Cold Bay. There currently is no USCG station between Kodiak and Dutch Harbor. Given the current level of maritime terrorism alert, the always highly dangerous fisheries of the North Pacific and Bering Seas, and the not infrequent need for medivac services in these far reaches of the Alaska Peninsula and the Aleutian Islands, every community of which can accommodate helicopter landings, a USCG helicopter station in Cold Bay would be a most welcome addition to the entire region.

In conclusion, the proposed road will be extremely costly on many fronts, not least the endangerment and probable fatalities of area residents. Other safer, more reliable and adaptable alternatives must be explored.

Thank you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Peter O. Mjos".

Peter O. Mjos, MD  
Former Medical Director,  
East Aleutians Borough

# King Cove to Cold Bay Road Proposal

## Testimony before the U.S. Army Corps of Engineers

### Anchorage, Alaska

### September 9, 2003

My first visit to King Cove, Alaska, as the King Cove village physician with the US. Public Health Service, happened in the autumn of 1973. Without an airstrip travel was either via an unofficial fishing vessel or a Grumman Goose amphibian, which plowed onto the beach at village centre.

Until I retired from the US. Public Health Service in 2002 I served the past fifteen years as Medical Director for the Eastern Aleutian Tribes, as well as village physician for King Cove and other villages within the region. Over those years I have endured many tumultuous flights between King Cove and Cold Bay, often in the near-death clutches of a petrified co-passenger. I have also experienced numerous seafaring passages between King Cove and Cold Bay in a panoply of vessels-from drift boats (one ran out of fuel, one experienced a bit of an explosion), seiners, and Bering Sea crabbers.

I have also participated in several medivacs aboard these craft. I should have a bumper sticker reading, "I survived the Cold Bay Dock and Ladder", a reference to the death-defying experience as one must climb a vertical ladder from the deck of a vessel heaving perhaps ten to twenty feet. With a medically incapacitated person the task becomes a near-impossibility.

The Critical Factor, however, and as just referenced by Mr. Juettner, is the Cold Bay meteorology-if too tempestuous, no flight is possible. Therefore, access to Cold bay, regardless of the conveyance, machts nichts, it matters not.

The specs on the proposed Hovercraft 150, the largest, with a listed sea maximum of eight to ten feet, leaves one quite dubious. When the Pacific low meets the ol' Bering high, eight to ten foot seas are rare indeed, and the likelihood that a Hovercraft could negotiate the maelstrom is but a fantasy, regardless of departure site, whether Lenard's Harbor or the NE. corner of Cold Bay.

There are always several ocean going vessels lying in King Cove which can make passage between King Cove and Cold Bay in two to four hours even in the very nastiest conditions, certainly any in which a plane can safely land and take-off in Cold Bay.

The Critical Need is a breakwater and disembarkation sufficient to protect and accommodate up to a 130 footer and passengers. The US. Coast Guard must make provision to certify or otherwise grant permission for vessels to emergently transport passengers. Furthermore, the US. Coast Guard should underwrite whatever safety features are necessary to accomplish emergency transports aboard these

vessels.

It is my fear, based on experience and studied observation, that a King Cove to Cold Bay road will inevitably claim lives, probably more than it would ever save. Why? The common hurricane-force bluster, as referenced by Mr. Juettner and others, admixed with rain, snow, hail, freezing spray, avalanches, impenetrable drifts, and zero visibility-impossible and impassable travel.

Guaranteed, particularly if stirred with a concoction of substances, that vehicles will become impaled and hopelessly stuck, they will be blown off and slide off the road, collide, and in subzero windchill conditions attempted walking is a prescription for an oft-tragic Alaskan scenario, magnified here in the Cradle of the Storms.

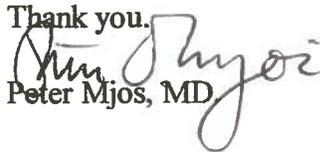
Road maintenance would be most costly and, at times, truly in harm's way.

Rescue attempts on this road and in this grave setting will place in serious jeopardy the lives of any who engage in a rescue effort.

In the name of disaster avoidance no road should be constructed beyond inner Lenard's Harbor. Rather, to seek permanent stationing of a US. Coast Guard helicopter crew and maintenance support in Cold Bay will serve quite well the entire Eastern Aleutian area.

To that end Alternative Five, with a skookum breakwater at Cold Bay, will avert tragedy.

Thank you.

  
Peter Mjos, MD

Date: May 17, 2012

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

Re: Izembek Land Exchange/Road Corridor Draft Environmental Impact Statement  
Request for Public Comment

**Expression of Support for the Land Exchange & Selection of Alternative #2**

Dear Ms. Brady,

We are writing today as representatives of our Ancestors and our way of life. We want to express our wholehearted support for King Cove's effort to have a road. This is one place where the Department of the Interior ("Department") can get it right, where it is possible to accommodate the land use needs of an indigenous people AND add significant acreage to the nation's publicly owned wetlands and wilderness. The community has expressed a strong preference for the route as laid out in Alternative #2. We understand that this means that a 19 mile, all-weather gravel road would be built on 227 acres of Federal land that would be transferred to the State of Alaska. We support them and write in favor of Alternative #2.

We want the members of the Agdaagux and Belkofski tribes to know that we believe they will work successfully with their state government and build this road to the highest standards; we have no doubt the construction will be closely scrutinized, as is appropriate to the quality of the land. To pursue their request of 9 miles through the Izembek Refuge, the tribes, State of Alaska, the King Cove Corporation, City of King Cove, and the Aleutians East Borough have formed a unique partnership and spoken in one voice in favor of this project and they have done so over many decades. They got together and designed a land assemblage that includes quality wetlands, pristine wilderness, and prime wildlife habitat. The Service is on the verge of receiving a spectacular gift. The appropriate response is to accept it. With thanks.

One of the factors included in the draft EIS is an analysis of the "Environmental Justice" of this action. We looked up the source of those words and traced them to Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. Signed on February 11, 1994, this directive orders each Federal agency to "make achieving environmental justice part of its mission" which you do by "identifying and addressing disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."

The conclusion under the environmental justice heading in the DEIS is that a no road decision will have "no adverse affects" on the low-income and minority populations of King Cove. How can that possibly be? Surely their human health will suffer greatly if the decision by

the Department should find that the road is not in the public interest and it is surprising that the report doesn't say so. Similarly, there is an adverse economic affect to King Cove's low-income and minority residents if this road is denied, as they are quite literally trapped, either because the cost of the flight to Cold Bay is out of reach or because they can't risk that bad weather will prevent their timely return to jobs and families. Where is an estimate of value of the lands that are proposed for exchange? And the residents of King Cove have waited decades for their moment of environmental justice, having been denied a full participation in the initial hearings on this Refuge. We sincerely hope their moment is now.

Congress was persuaded of the merits of King Cove's request for safe, reliable and affordable road transportation for its citizens, otherwise they wouldn't have passed the legislation that has required this DEIS. The federal government should take the next step and accept this unparalleled opportunity by adopting Alternative #2 as the most responsible choice, but also because it brings invaluable new lands into the public domain and represents the most equitable solution for the Aleut shareholders of the King Cove Corporation.

We appreciate your consideration of our remarks.

Sincerely,

Rebecca Bendixen  
Aleut Corporation Shareholder from King Cove, Alaska

Tanna Y. Lewis  
P.O. Box 167  
King Cove, Alaska 99612  
Phone: 907-497-4038  
[tannays@hotmail.com](mailto:tannays@hotmail.com)

May 18, 2012

To Whom It May Concern:

My name is Tanna Y. Lewis. I was born and raised here in King Cove. I am a King Cove Corporation shareholder and belong to the Agdaagux Tribe of King Cove.

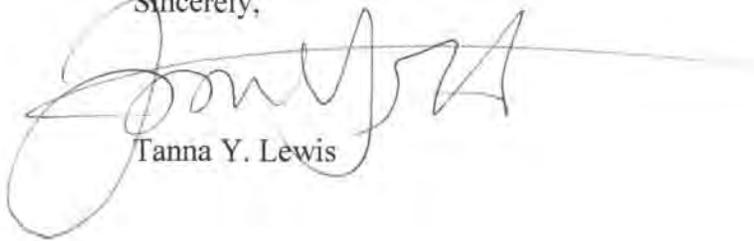
February of 1989 is when the limited access to the all weather runway in Cold Bay began affecting my life in a very personal way. That was the winter that my Dad suffered a major heart attack and could not reach the proper medical attention he needed for over 2 days because of the unstable weather. In that time, he suffered a small number of minor heart attacks, which may have contributed to the severe damage caused to his heart, which later required a heart transplant. Needless to say, his body rejected the new heart and he died almost 3 years to the day that he suffered that initial attack. I always wonder whether he would have had a longer life if he had received the necessary medical attention in the timely manner that was hindered by the lack of access in and out of our community during foul weather. This is one instance of many that has affected our community members and visitors alike when an emergency arises, and you are left without choices.

In the years since, I along with numerous others have had to deal with being stranded to a certain extent, trying to travel in or out of King Cove. When I had my first child in November of 2006, I could not come home for 10 days after her birth because of the harsh weather. Some days were too nasty for a boat to go to Cold Bay to pick up passengers. On the days that a boat could make it to Cold Bay, I still could not go home, I could not climb the ladder at the Cold Bay dock because I had experienced a birth by cesarean section, making it incredibly difficult for me to attempt such a feat. I should have been reveling in the birth of my first child in those days following her arrival, yet, I spent them wondering when and how we were going to make it home. On that tenth day, the weather cleared enough for flights to go in and out of King Cove. It wasn't a pretty fight; it was blowing northwest 20+. I couldn't tightly fasten by seatbelt down as I normally would have on a flight in those conditions, because of the c-section. All I could do was loosely fasten my belt and spend the entire flight holding myself in a tense position with my feet pushing off of the seat in front of me, and pulling myself up on the handle above me, using every muscle in my body, so not to irritate my incision with the seatbelt as we were thrown in all directions. This is yet another instance of many that have affected all of us when trying to travel home during bad weather conditions and there is inadequate access.

In recent occurrences, I was on the plane prior to the one that had crashed on April 26, 2010. Yes, it was windy, it was turbulent, and it was terrifying. I am thankful everyday that I chose to go on that first plane rather than wait to see if the weather was safe enough to fly, as I usually do. I am assuming that our safe landing and the safe return of the pilot, determined that it was indeed safe enough to fly. As in the occurrence of that second plane crashing, that is a prime example of how unpredictable our weather is. We shouldn't have to thank our lucky stars that we chose to get on the plane that didn't crash.

We deserve safe and dependable access to and from our community. People shouldn't have to suffer further complications because there are no means to leave the community during bad weather, we shouldn't have to undergo stranded ness from our homes because of the lack of access that is within our reach. Everyday we make life and death choices, whether it's for emergencies or not, our lives should not have to be determined by visibility or which direction and how hard the wind in blowing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tanna Y. Lewis', with a long horizontal line extending to the right.

Tanna Y. Lewis

Allen E. Smith  
6123 Buckthorn Ct. NW  
Olympia, WA 98502-3434  
(360) 867-4111 (RES)  
(360) 867-9453 (CELL)  
[snoshuak@comcast.net](mailto:snoshuak@comcast.net)

Mr. Geoff Haskett, Alaska Regional Director  
U.S. Fish & Wildlife Service  
1011 East Tudor Rd., MS-231  
Anchorage, AK 99503

May 18, 2012

**RE: CORRECTED COPY OF COMMENTS - DRAFT ENVIRONMENTAL  
IMPACT STATEMENT – IZEMBEK NATIONAL WILDLIFE REFUGE  
PROPOSED LAND EXCHANGE/ROAD CORRIDOR (DEIS)**

Dear Mr. Haskett:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Izembek National Wildlife Refuge Proposed Land Exchange/Road Corridor required by the Omnibus Public Land Management Act of 2009. I have over thirty years of experience with the Alaska National Interest Lands Conservation Act (ANILCA). I previously served as Executive Officer in the Land & Natural Resources Division, USDOJ (1979 to 1982), as President and CEO of Defenders of Wildlife (1982 to 1986), as Vice President of The Wilderness Society (1986 to 1989), and as Alaska Regional Director and Senior Policy Analyst for The Wilderness Society (1989 to 2004). I have visited Izembek with USFWS and State of Alaska officials to review this issue on the ground and have analyzed and commented extensively on previous King Cove to Cold Bay transportation plans and EIS's in that capacity.

**SUMMARY STATEMENT**

I strongly oppose the proposed land exchanges and construction of a road through the Izembek National Wildlife Refuge Wilderness Area outlined by Alternative 2 and Alternative 3 of the DEIS and urge USFWS to select Alternative 1 – No Action for its decision in the Final EIS and Record of Decision. The ecological niche and biological functions of Izembek and its protected Wilderness Area represent unique world-recognized natural habitat and wildlife values that cannot be replaced by other lands. No road can be constructed there without permanently disrupting, impairing, and ultimately destroying that ecosystem and its wildlife, including endangered species. USFWS already stated in its King Cove Briefing Report, Izembek NWR, in 1997 that such a road through Izembek Wilderness was not in the public interest and they should reaffirm that public interest finding now and reject the land exchanges. Other proven transportation alternatives exist that should be encouraged instead of the proposed land exchanges and road. The DEIS is significantly deficient on many levels and Alternative 1 – No Action is the only valid decision that can be made here in the public interest.

**Allen E. Smith Comments on Proposed Izembek NWR Land Exchange/Road Corridor DEIS – Page 2, May 18, 2012**

It has been demonstrated over and over again and should be an article of faith that every ecosystem has a biological heart, an area that is the most important to the biological functioning and integrity of the whole ecosystem. It cannot be traded away or the whole ecosystem will fail and the legal purposes for which an area was protected will also fail. Trading that heart for a larger quantity of lands of lesser biological value elsewhere as mitigation to build a road will not provide alternative lands for the wildlife impacted and displaced by the road and cannot make up for the importance and loss of that biological heart and the loss of the wilderness that protects it. The land will be terminally diminished without that heart. The Arctic National Wildlife Refuge would not function without the richness that its coastal plain provides its wildlife and the Tongass National Forest would not function without its old growth forest riparian zones. The narrow isthmus that separates Izembek Lagoon from Kinzarof Lagoon where the proposed road would be located is a wetland densely dotted with ponds and lakes that support a wide diversity of wildlife. It is the biological heart of this fragile ecosystem critically vital to that wildlife and extremely sensitive and vulnerable to environmental impacts from any man-made intrusions. The false premise of the proposed land exchanges embraced by Alternative 2 and Alternative 3 in the DEIS is that the biological heart of Izembek National Wildlife Refuge and its Wilderness Area can be traded away for lands of lesser value without significant consequence. The DEIS fails to address this and the only legitimate decision that can be made in the public interest is Alternative 1 – No Action.

**BACKGROUND**

Izembek's early designation as a National Wildlife Range in 1960 by Secretary Frederick Seaton in Executive Order 2216 during the Eisenhower Administration is exemplary of how long its unique natural values have been widely recognized. Renamed Izembek National Wildlife Refuge and largely designated as a Wilderness Area by Congress in the Alaska National Interest Lands Conservation Act (ANILCA) in 1980, it was designated as the United States' first Ramsar site in 1986 under the international Convention on Wetlands of International Importance, and recognized as a Globally Important Bird Area by the American Bird Conservancy in 2001.

The recent history of concerted efforts by King Cove to secure a road across the Izembek NWR and Wilderness Area as a human health and safety need only surfaced well after ANILCA's passage. Those of us who have visited King Cove and Cold Bay and worked on this issue remain sensitive to finding solutions to King Cove's legitimate human health and safety needs without compromising the biological integrity of the Izembek NWR and Wilderness Area. This includes exploring alternative means of marine transport, upgrades to medical facilities in King Cove, and improving the King Cove airstrip. In 1997, USFWS stated in its King Cove Briefing Report, Izembek NWR that *"the Service finds the road alternative contrary to the purposes of the refuge and foresees unacceptable environmental impacts if a road is constructed on refuge lands through the wilderness area."* Nothing has changed the facts that led to that USFWS statement.

**Allen E. Smith Comments on Proposed Izembek NWR Land Exchange/Road Corridor DEIS – Page 3, May 18, 2012**

At the urging of the Alaska congressional delegation, Congress passed the King Cove Health and Safety Act in 1998 and appropriated \$37.5 million to upgrade King Cove medical facilities, improve King Cove airstrip, and provide a marine link between King Cove and Cold Bay for medical evacuation to the Cold Bay Airport. Despite that significant federal grant to help King Cove they still want the road through the Izembek NWR and Wilderness Area.

**ANALYSIS**

The statement of purpose and need in the DEIS appears to be narrowly drafted to respond only to the *Omnibus Public Land Management Act of 2009* (Public Law 111-11, Title VI, Subtitle E) and the conclusion by the State of Alaska et al that “*a road connecting the City of King Cove to the Cold Bay Airport is the only safe, reliable, and affordable means for year round access to medical services not available in King Cove, ...*” In so narrowing the scope, the DEIS fails to accurately and fully frame this issue and fails to fully address the other statutes that USFWS must respond to in deciding this issue. No sound public interest finding and decision can be made here without considering USFWS responsibilities to the Wilderness Act, ANILCA, the National Wildlife Refuge Improvement Act, other governing statutes, and its own stewardship responsibilities for national wildlife refuge lands and wildlife. The DEIS fails to do that.

The proposed land exchange and road corridor are not in the public interest and would compromise the:

- historic recognition of Izembek’s natural values in the protections that prior administrations and Congress have given to Izembek for more than fifty years as a national wildlife range, national wildlife refuge, wilderness area, and Ramsar site,
- purposes of the Izembek National Wildlife Refuge established by Congress in ANILCA Section 303 (B),
- compatibility standard of the National Wildlife Refuge Improvement Act in its inconsistency with those ANILCA purposes,
- Izembek Wilderness Area established by Congress in ANILCA Section 702 (6),
- integrity of the remaining Wilderness Area by creating access that would allow uncontrollable environmental impacts outside the proposed road corridor, and
- public interest finding by costing taxpayers at least 13 times the benefits.

The biological questions that loom over the proposed land exchange and road corridor are enormous and are framed by the values that have been historically protected at Izembek. USFWS fails to analyze them adequately in the DEIS. The area that would be opened by the road is a fragile narrow isthmus of wetlands that is used by wildlife for migration up and down the Alaska Peninsula, forage, resting, nesting, fledging and rearing young, wintering, and endangered species recovery for Steller’s eiders. Caribou, grizzly bears, wolves, emperor geese, brant, eiders, and many other species of birds all use this area for their needs and would be displaced and impacted by a road.

**Allen E. Smith Comments on Proposed Izembek NWR Land Exchange/Road Corridor DEIS – Page 4, May 18, 2012**

This narrow isthmus abuts the largest eel grass beds in the world, important food to waterfowl that is vulnerable to environmental degradation. The isthmus is at sea level and sea level rise due to climate change will present problems for the wildlife here as they try to adapt to it. There is a significant future risk to the Izembek NWR eelgrass beds from climate change as shown by recent research at the University of Washington Marine Sciences Laboratory that indicates climate change could be impeding the growth of eelgrass. Obviously, any road built here would also be vulnerable to sea level rise and its run-off would impact the eel grass beds. The stated small acreage that would be conveyed to the State of Alaska as a right-of-way to build a road through the Izembek Wilderness Area across the narrow isthmus belies the environmental impacts such a road and its construction would have on this fragile environment.

Further, USFWS must take in account its stewardship responsibilities for the interrelated ecosystems of Izembek NWR and the Unimak Island Unit of the Alaska Maritime NWR. The narrow wetland isthmus between Izembek Lagoon and Kinzarof Lagoon is a constricted area and a road there could constrain or impede the gene flow from Izembek and the southern Alaska Peninsula onto Unimak Island and its Wilderness Area, which is also managed by USFWS through Izembek NWR. The construction of a road from King Cove to Cold Bay would create interference with this natural process and has biological ramifications that USFWS failed to address in the DEIS.

The DEIS is significantly deficient in its Benefit Cost Analysis for the land exchange under both Alternative 2 and Alternative 3 as shown by the comments submitted by The Wilderness Society and the Center for Economic Sustainability RE: Izembek National Wildlife Refuge DEIS dated May 17, 2012. In their economic analytical review of Alternative 2 and Alternative 3 in the DEIS, the Center for Economic Sustainability concluded that, *“in a more credible assessment of benefits and costs than those included in the baseline, costs are likely to exceed benefits by a factor of 13.”* (Page 9) Since the assumption is that federal grants will pay for Alternatives 2 and 3, the US taxpayer could be handed an unexpected large bill for such a miscalculation of several hundred million dollars in the future if either of these alternatives is chosen. This costly aspect of the proposed land exchange and road construction alone is enough to render it not in the public interest.

Building and maintaining a road north from Lenard Harbor to the edge of the Izembek Refuge Wilderness Area would be extremely difficult because of the soils, avalanche terrain, and recurring bad weather. It may be in King Cove’s best interest to re-examine that decision and use the federal grant it received from the King Cove Health and Safety Act of 1998 to build a good marine link from Lenard Harbor to Cold Bay instead of that road north. The benefit cost analysis suggests it may also be in the best interest of the US taxpayers who are paying for this. USFWS must look at this decision in that light as well to frame its public interest finding. Congress should also look at this question in its oversight role of accounting for how the grant has been used.

**Allen E. Smith Comments on Proposed Izembek NWR Land Exchange/Road Corridor DEIS – Page 5, May 18, 2012**

King Cove has demonstrated that it can respond to its human health and safety needs without a road to Cold Bay. The Aleutians East Borough has successfully operated a hovercraft between Lenard Harbor and Cold Bay for a number of years to fulfill those needs and, as it turns out, for other transport purposes as well. The Borough has decided it will suspend hovercraft operations in the future because they are too costly and has continued to pursue getting the road, but it should be pointed out that operating the hovercraft is nowhere near as costly as the road would be.

Further, as this DEIS is under public review and comment, the Aleutians East Borough has written to the US Army Corps of Engineers on February 24, 2012 to clarify that they can now acquire and use a 59' X 16' Landing Craft/Passenger Ferry to Cold Bay instead of the hovercraft. In that same letter, the Borough states that, "*We believe that we have saved lives using the hovercraft during medical emergencies, but at great costs and with limited success in our regular, non-emergency hovercraft operations.*" What does this all mean? The DEIS does not address any of this or evaluate these facts in the context of the request for the road and it should.

So why are the Aleutian East Borough and King Cove saying they need the proposed road through the Izembek Wilderness because the hovercraft does not work, but at the same time the Aleutians East Borough has decided to use a hovercraft for access across what is arguably more difficult open water than Cold Bay between its village of Akutan on Akutan Island and a proposed new airport on Akun Island? And why is the Aleutians East Borough now pursuing a landing craft solution for crossing Cold Bay? None of this has been addressed in the DEIS and it must be.

We have heard for a long time that this issue is really about commercial development, but that is difficult to openly discern and deal with when the issue is presented as legitimate human healthy and safety needs. On my trip from King Cove back to Cold Bay aboard a crab boat in 1997 I asked the captain what was really the issue here in King Cove. He told me that it was about commercial interests getting fish product to the Cold Bay airport for transport to market. If that is true, it is not a valid reason to build a road across the Izembek Wilderness Area. As it is, I believe that we can solve the legitimate human health and safety needs of King Cove without the road. In fact, they may be moving to do that with a landing craft solution, which can be done under the prior authorizations of the 1998 Act. This too calls for a decision to choose Alternative 1 – No Action.

These are but a few of the many critical questions that should have been answered in the DEIS, but were not. Congress, by the 2009 Act, has delegated a very serious responsibility for this decision back to the U.S. Fish and Wildlife Service and the U.S. Department of the Interior. It is a decision that could have significant precedence in the future management of other existing Wilderness Areas and federal lands.

**Allen E. Smith Comments on Proposed Izembek NWR Land Exchange/Road Corridor DEIS – Page 6, May 18, 2012**

**CONCLUSION**

USFWS has not fully considered and adequately analyzed the history of this issue and all the relevant aspects of the alternatives in the DEIS. Aleutians East Borough is further clouding the issue by proposing yet another marine alternative with its landing craft proposal to the US Army Corps of Engineers thus admitting that they can operate without a road. Given this picture and the facts, the only reasonable decision for USFWS is to choose Alternative 1 – No Action.

It is hard to visualize any reasonable support for a decision that would find that the proposed land exchange and road corridor across the Izembek Wilderness Area are in the public interest. In the face of the existence of other proven reliable access alternatives using marine links between King Cove and Cold Bay it is unnecessary to invade this wildlife refuge and its wilderness and disrupt its natural process. I remain opposed to this proposed land exchange and road corridor. None of the proposed lands to be added to the refuge replace the values that would be lost and given up. The proposal would cut open the heart of the Izembek NWR and its Wilderness Area.

Again, thank you for the opportunity to comment on this DEIS.

Sincerely yours,

Allen E. Smith

**DAVID McCARGO**

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May 16, 2012

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

SUBJECT: Izembek NWR Land Exchange/Road Corridor DEIS

To Whom It May Concern:

Having been an Alaskan for almost forty years, and also having been to King Cove, Cold Bay, and the Izembek NWR, I would like to submit the following comments pertaining to the King Cove Road DEIS.

- ✓ First and foremost a twenty-mile road would constitute a major intrusion into the Refuge figuratively and perhaps literally breaking its back. Anyone looking at the map can see that the Refuge is shaped like a horseshoe and that the road will effectively cut it in half. Controlling off-road access to adjacent lands would be virtually impossible access being the biggest threat to wilderness values. It is simply naive to think that once a road is built that locals will not drive off it and otherwise impact adjacent lands. There already is documentation of this occurring by FWS (DEIR p. 3-42) "... *within the Izembek Wilderness ...*". The virtue that the Department is unable and/or unwilling to protect the most sacrosanct of our public lands speaks volumes about what a poor steward it is.

Any supposed guarantees that there would be access restrictions are further untrustworthy as evidenced by the opening of the Dalton Highway and adjacent lands for public access after an initial agreement that such would not be the case. Once the King Cove to Cold Bay Road is completed, it can be expected that the local communities given tradition will want the road to become a general-use corridor over and above the demonstration that local residents already are flouting the law. Much of the testimony at the Anchorage Hearing suggested exactly this with local residents saying that they wanted the road for "quality of life reasons" which can mean just about anything from off-road ORV hunting to commercial use.

- ✓ The proposed land exchange, especially of this magnitude and complexity, would be a horrible precedent for Wilderness, and the Congress made a serious mistake by kicking the ball to the Secretary. Wilderness is the highest level of public land protection and boundary tampering should be done with extreme caution if at all. In my opinion, there should be only two criteria for modifying Wilderness boundaries wherein a land exchange is involved: 1) there would be a overwhelming preponderance of benefit to the Wilderness, and 2) where the failure to do so would result in unacceptable offsite

environmental impacts. Neither of these criteria are met in this instance. The history of land exchanges in Alaska has served conservation interests poorly witness the Red Dog and Anaktuvuk Pass Land Exchanges.

- ✓ There is an obvious conflict between costs and needs, and there has been no cost/benefit analysis that gets to the root of the issue at hand. Public Land Law 105-227 poured almost \$40 million dollars, or roughly \$4,000 per person, to fund a hovercraft, state-of-the-art medical clinic, a major airport upgrade and a seventeen mile road with not much to show for it. Where will these huge subsidies end and what will be the ultimate benefits? This is like a perpetual motion machine of costly mistakes to fix a problem that may not be fixable. There is the cost of maintaining the road throughout the year. Extending the road up the side of Cold Bay from Lenard Harbor may be costly to build and maintain given the topography not to mention maintaining the entire fifty mile all-weather road from Cold Bay to King Cove.
- ✓ As a matter of public policy, the larger issue is a universal sense of entitlement with the public simply not having the resources to cater to everybody's wants and needs no matter how legitimate-sounding they may be. The U.S. is bankrupt because everybody wants everything with Alaskans being among the most coddled by the public purse. We simply cannot build and maintain roads to every village and cabin, have doctors and hospitals in every community, and provide jobs where people want them presuming that they can be employed anywhere. It has been the government largess that kept most of these communities going in the first place. Even the Supreme Master of Pork Himself Senator Stevens warned Alaskans that the gravy train was coming to an end. The proponents of these schemes almost always want someone else to pay for it including Uncle Ted's political spawn who are continuing His tradition of having no fiscal conscience and who will stoop to any nonsensical idea to stay on the fiscal gravy train.
- ✓ The overt but suspect reason for building a road is to improve the safety of medical evacuation. Even in Anchorage if one has a serious medical issue and depending upon what it is, one had to go or be Medivaced to a hospital in Seattle such as Harbor View, the Virginia Mason Clinic, Swedish, or the University of Washington. King Cove residents and other Alaskans are shameless in that they want the people of Missouri and New Jersey to forever subsidize their services without the prospect of ever reciprocating.
- ✓ There was a strong undercurrent of inferred racism if not outright statements of it in much of the testimony presented at the Anchorage Hearing. Out came the old canards of guilt that the white man took Native lands and hauled the Aleuts off to camps in Southeast Alaska as if they had anything to do with building a road. Another regurgitated theme is that the Aleuts have thousands of years of history of living in the area and have respect for the land. Notwithstanding that Alaska indigenous peoples have lost most of their cultural roots, the notion that they are magically conservationists echoes Ralph Wald Emerson's observation that "the louder he talked of his honor, the faster we counted our spoons". This was a myth started by naive environmentalists in the 1960's who were casting around for historical icons that has become gospel within the Native community not based on fact. The overwhelming evidence is to the contrary. Some of the "Aleuts" testifying clearly had no factual sense of their own history.

King Cove City Manager set the tone for the road proponents in a prior published statement by rhetorically asking “Just how many tundra swans equal one dead Aleut?” Aside from the racial connotation, the statement suggests that wildlife plays second fiddle to the “indigenous” community despite all of its hoop-dee-do that they are “stewards of the land”. If one wants to count beans and compare the numbers of people to the numbers of just about everything else on this planet, people are the most expendable other than just about everything perhaps excepting rats and flies. There is a mis-presumption that humans are more important than the rest of Nature, and it is this humanistic arrogance that has destroyed our planet. If one were to compare the value of entities on the base of scarcity, yes, swans are more important than people. Furthermore, it is an absurd concept that people are valuable without limit and that they should be kept alive at any cost.

- ✓ The announcement of the East Aleutian Borough that it is pulling the hovercraft out of service for use at Akutan negates Alternative Four. Why were the No Exchange Alternatives that are presented now not originally presented? To add insult to injury, the Akutan airport is yet another huge boondoggle at taxpayers expense. This further invites supposition that the DEIS may be lawfully insufficient not to mention that there is no discussion of potential cumulative impacts required by NEPA. The Omnibus Public Lands Management Act that set the EIS process in motion further prejudiced its execution by designating what authorized entities might participate almost all of whom have an interest in having the road approved and built. There may be a statutory conflict between the OPNMA and NEPA.
- ✓ What are the ecological and wilderness values of the lands be offered in exchange for the road corridor, and do their additions make managerial sense? The Kinzarof Parcel would be of marginal value owing to its proximity to the roads system, and the Mortensen’s Lagoon Parcel would be split from the rest of the Refuge. The Selection Parcels within the Izembek and Peninsula Refuges already are protected under 22g, and the Aleut Corporation would get subsurface rights elsewhere that would become a future problem. The more one looks at the proposed exchange the more decidedly negative it appears.

For the reasons presented above, I urge the Secretary to reject the proposed land exchange and select the No Action Alternative in the absence one that would clearly benefit environmental interests, be cost-effective, and be logistically sensible.

Respectfully yours,



David McCargo

DMcC/dmcc

cc: Senator Claire McCaskill

Pat Pourchot, Special Assistant for the Secretary for Alaska

**Alaska Center for the Environment • Alaska Wilderness League  
American Birding Association • American Rivers • Audubon Alaska  
Blue Goose Alliance • Center for Biological Diversity  
ConservAmerica • Cook Inletkeeper • Defenders of Wildlife  
Friends of Alaska National Wildlife Refuges • League of Conservation Voters  
National Wildlife Refuge Association • Natural Resources Defense Council  
Northern Alaska Environmental Center • Sierra Club • The Wilderness Society  
The Wildlife Society • Western Lands Project • Wilderness Watch  
Wildlands CPR • World Wildlife Fund**

May 18, 2012

Mr. Geoff Haskett, Alaska Regional Director  
U.S. Fish and Wildlife Service  
1011 East Tudor Road, MS-231  
Anchorage, AK 99503

Via U.S. and Electronic Mail ([izembek\\_eis@fws.gov](mailto:izembek_eis@fws.gov))

**Re: Draft Environmental Impact Statement for the Izembek National Wildlife Refuge  
Proposed Land Exchange/Road Corridor**

Dear Mr. Haskett:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Izembek National Wildlife Refuge (Izembek Refuge) proposed land exchange and road corridor, which the U.S. Fish and Wildlife Service (Service) released for public comment March 19, 2012. The 22 undersigned organizations strongly oppose a land exchange to facilitate the construction of a permanent gravel road between King Cove and Cold Bay, Alaska – a road that would slice through the ecological heart of Izembek Refuge and sacrifice high-quality Refuge and Wilderness lands. These actions, which are the foundation for Alternatives 2 and 3, would have profound negative impacts far beyond the footprint of the road. This EIS, required under the provisions of the 2009 Omnibus Public Land Management Act,<sup>1</sup> must analyze these impacts, as well as inform the Secretary of the Interior’s decision regarding whether the proposed land exchange and road corridor are in the public interest. We urge the Service to choose Alternative 1, the No Action Alternative, as its preferred alternative in the Final EIS and Record of Decision. We believe the No Action Alternative best embodies the Service’s responsibility to conserve, protect and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people, and best serves the public interest.

In 1997, the Service determined that a road through Izembek Refuge was not in the public interest, stating that “[t]he Service finds the road alternative contrary to the purposes of the refuge and foresees unacceptable environmental impacts if a road is constructed on refuge lands through the

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<sup>1</sup> P.L. 111-11, Title VI, Subtitle E.

wilderness area.”<sup>2</sup> Congress subsequently rejected the road proposal through its 1998 passage of the King Cove Health and Safety Act, which appropriated \$37.5 million to develop an alternative solution to King Cove’s health and safety concerns – one that “[i]n no instance may...enter or pass over any land within the Congressionally-designated wilderness in the Izembek National Wildlife Refuge.”<sup>3</sup> As was the case 15 years ago, the current road and land exchange proposal is not in the public interest. Adoption of either DEIS Alternative 2 or 3 would:

- undermine long-standing congressional and administrative protections – setting a harmful precedent for de-designating Wilderness and allowing for harmful ecological impacts that compromise Refuge purposes,
- exchange incomparable refuge habitat for lands of lower ecological value,
- add millions more dollars to the \$37.5 million price tag that taxpayers have already spent on this issue;
- unnecessarily replace an effective and workable solution to the stated problem that already exists; and
- fail to provide year-round, reliable access.

Our comments describe these impacts, and subsequently identify deficiencies in the DEIS that must be addressed to ensure a thorough and objective analysis of the proposed land exchange and road corridor in the final document.

## **I. THE PROPOSED LAND EXCHANGE AND ROAD CORRIDOR ARE NOT IN THE PUBLIC INTEREST**

The proposed land exchange would disconnect Izembek Refuge from its ecological heart and subject the area to the disturbance and degradation of subsequent road construction and use, resulting in the loss of a globally significant wetland wilderness. Alternatives 2 and 3 would result in a variety of harmful legal, ecological, and economic impacts that clearly demonstrate that the proposed land exchange and road corridor are not in the public interest.

### **A. The Proposed Land Exchange and Road Would Compromise Long-held Administrative and Congressional Protections**

The proposed land exchange and road corridor would permanently destroy fragile wetlands, wilderness, and wildlife habitat, as well as undercut public trust in long-established congressional and administrative safeguards and obligations. Good stewardship practices require that the integrity and protection of our nation’s public lands are upheld and that conservation decisions are based on sound science, not short-term profit or politics. Long and careful consideration was given to selecting the boundary of the Izembek Refuge and to identifying the purposes for which the Refuge was established. Similarly, the National Wildlife Refuge System Improvement Act of 1997, adopted with bipartisan input and support, established a unified mission for the Refuge System, as well as standards for compatible uses. The land exchange and the road corridor proposal not only

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<sup>2</sup> U.S. Fish and Wildlife Service, King Cove road briefing report, Izembek National Wildlife Refuge (1997).

<sup>3</sup> Omnibus Consolidated and Emergency Supplemental Appropriations Act of 1999, Public Law 105-227 § 353.

jeopardizes Izembek Refuge and puts the entire National Wildlife Refuge System at risk, the proposal also undermines the protections provided by the Wilderness Act of 1964. Circumvention of the act puts at risk designated Wilderness areas throughout the National Wilderness Preservation System.

## **1. The Proposed Action Would Erode the Original and Historic Boundary of the Refuge**

Izembek National Wildlife Range was established by Executive Order 2216 in 1960, during the Eisenhower administration. The boundary was carefully drawn to protect the integrity of the entire watershed of Izembek Lagoon and associated lands for "a refuge, breeding ground, and management area for all forms of wildlife." The very high quality of lands within the Izembek National Wildlife Range were already well known for their exceptional value for waterfowl and many other species of migratory birds, fish, and mammals. The newly established area represented a cohesive unit of lands, waters, and habitats necessary to achieve the conservation objectives of the Range. In 1980, the Alaska National Interest Lands Conservation Act (ANILCA) strengthened our nation's commitment to protecting the area by changing its name to the Izembek National Wildlife Refuge.

Passage of ANILCA was a decade-long process that included town meetings, hearings, debates, numerous editorials and opinion pieces, outreach to multiple Native organizations, and state, federal, and joint governmental proposals spanning several congressional sessions. Throughout the many House and Senate hearings leading to passage of ANILCA, the road issue was not raised nor was it advocated by the members of the Alaska congressional delegation.

At that time, there was overwhelming support for the Refuge Wilderness, including a letter from the Governor of Alaska. Section 702 of ANILCA designated approximately 300,000 of the Refuge's 417,533 acres as Wilderness, to be administered under the provisions of the Wilderness Act of 1964 and ANILCA. In adopting Section 702, Congress provided the highest possible level of protection for most of the area within Izembek Refuge that would be affected by the current land exchange and road corridor proposal. This level of protection is well deserved, and the following excerpt from the 1979 House Report clearly states that "[t]he Izembek Wilderness possesses outstanding scenery, key populations of brown bear, caribou and other wilderness-related wildlife, and critical watersheds to Izembek Lagoon. About 68 percent of the total lands in Izembek Lagoon are covered with the largest eelgrass beds in the world. These beds are utilized by millions of waterfowl for migration and wintering purposes. A wilderness designation will protect this critically important habitat by restricting access to the Lagoon."<sup>4</sup> The original boundary deliberately included the lagoon complex.

In 1986, the Izembek Refuge received global attention as the first U.S. site to be designated a "Wetland of International Importance" by the Ramsar Convention on Wetlands of International Importance. Another recognition occurred in 2001, when the Refuge was recognized as a Globally Important Bird Area by the American Bird Conservancy.

The DEIS affirms the high value of wetlands in the proposed road corridor.<sup>5</sup> Furthermore, the high habitat values of the isthmus region where the proposed road would be built are properly described

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<sup>4</sup> House Report No. 96-97, Part II (p. 136), 1979.

<sup>5</sup> DEIS at 3-89.

in several sections of the DEIS that note the importance of the Wilderness lands to several species of wildlife.

The value of Izembek Refuge has been recognized since its original establishment in 1960 and further reinforced through additional legislation and designations as a discrete area of national and international significance for its wildlife, fish, and habitat as well as a wilderness resource. The ecological quality of its lands and waters is of the greatest magnitude. The paramount conservation goal is to preserve the ecological integrity, wilderness character, and other establishing purposes of Izembek Refuge.

## **2. The Proposed Action Is Incompatible with the Purposes for Which Congress Established the Refuge**

In 1980, ANILCA designated approximately 105 million acres of federal land in Alaska for the protection of natural resource values by permanent federal ownership and management.<sup>6</sup> Izembek Refuge was included among the lands designated for environmental protection under ANILCA. Congress specifically stated in ANILCA that Izembek Refuge was protected for the following purposes:

- (i) To conserve fish and wildlife populations and habitats in their natural diversity including, but not limited to, waterfowl, shorebirds, and other migratory birds, brown bears, and salmonoids;
- (ii) To fulfill the international treaty obligations of the U.S. with respect to fish and wildlife and their habitats;
- (iii) To provide, in a manner consistent with the purposes set forth in subparagraphs (i) and (ii), the opportunity for continued subsistence uses by local residents; and
- (iv) To ensure, to the maximum extent practicable and in a manner consistent with the purposes set forth in paragraph (i), water quality and necessary water quantity within the refuge.

Since 1985, when the Bristol Bay Regional Management Plan noted the King Cove road project,<sup>7</sup> the Service has consistently found that a road across the narrow isthmus between Izembek and Kinzarof lagoons would be incompatible with the purposes for which Congress established the Izembek Refuge and that a road would cause significant, long-term damage to important fish, wildlife, habitat, and wilderness values of the Refuge. For example, in an August 1997 King Cove Road Briefing Report, the Service found the “road alternative contrary to the purposes of the refuge” and anticipated “unacceptable environmental impacts if a road is constructed on refuge lands through

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<sup>6</sup> S.Rep. No. 413, 96th Cong., 2d Sess. 126, reprinted in 1980 U.S. Code Cong. & Ad. News 5070, 5071.

<sup>7</sup> U.S. Department of the Interior, BRISTOL BAY REGIONAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, Prepared under the direction of the Assistant Secretary of the Fish and Wildlife Service with assistance from the Alaska Land Use Council and its Bristol Bay Study Group (1985).

the wilderness area.”<sup>8</sup> A 2003 EIS on the King Cove Access Project, prepared by the Army Corps of Engineers in cooperation with the Service and funded by Aleutians East Borough, examined the potential threats of the proposed road and found the all-road alternative to be the most damaging of all the alternatives evaluated.<sup>9</sup> The report cited direct, indirect, and cumulative impacts on the lands and on wildlife.

All of the stated purposes for Izembek Refuge pertain to the conservation of its unique ecological characteristics and species.<sup>10</sup> By cutting out the Refuge’s ecological heart through a land exchange and subjecting the area to the disturbance and degradation of subsequent road construction and use, this proposal would severely compromise the Service’s ability to carry out each of these purposes across the Refuge as a whole.

***a. Conserving Fish and Wildlife Populations and Habitats in their Natural Diversity***

The Izembek watershed surrounding the lagoons abounds with brown bear, caribou, and wolves and is rich in anadromous fish streams. The pristine nature of Izembek Refuge and its critical importance for wildlife led to 95 percent of its area being designated Wilderness under ANILCA.

A road through this ecologically sensitive habitat would fragment and degrade the integrity of the lagoon complex. This would result in impacts that extend well beyond the road and affect the integrity of the entire refuge. Birds and mammals use the lagoons, isthmus wetlands, tundra, and tidal flats to nest, feed, transit, and forage. The species hardest hit will be those whose essential habitat would be directly or indirectly impacted by road construction, maintenance, and traffic. In particular, Pacific brant, Steller’s eiders, emperor geese, caribou, tundra swans, brown bears, sea otters, sea lions, seals and whales would be impacted. Several of these species are rare, declining, or listed as threatened under the Endangered Species Act.

The Izembek Refuge supports two subpopulations of tundra swans; one is migratory and part of the relatively large western population, while a much smaller, distinct resident population is also present. (See climate change below for comments regarding black brant, Steller’s eider, and caribou.)

The resident swan population is less stable than migratory populations and has declined steadily over the past twenty years. Tundra swans are very sensitive to human disturbance, especially during nesting and molting periods. Therefore, we generally concur with findings presented in the DEIS, which states that a new road would lead to an effective loss of habitat much larger than the footprint of the road.<sup>11</sup> The DEIS acknowledges that the unique resident population of tundra swans of the Izembek Refuge has abandoned habitat adjacent to existing roads and trails near Cold Bay. We concur with the general finding that Alternatives 2 and 3 would result in impacts with “medium to high intensity with long-term (behavioral disturbance) to permanent (habitat loss).”<sup>12</sup>

The narrow isthmus between Izembek and Kinzarof lagoons is a crucial travel corridor—the only path between the west and east sides of the Refuge—for wide-ranging species such as bears,

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<sup>8</sup> U.S. Fish and Wildlife Service, King Cove road briefing report, Izembek National Wildlife Refuge (1997).

<sup>9</sup> U.S. Army Corps of Engineers, King Cove Access Project, Final and draft environmental impact statements, Alaska District (2003).

<sup>10</sup> ANILCA, Section 303(3)(B).

<sup>11</sup> DEIS at 4-139.

<sup>12</sup> DEIS at 4-140 and 4-242.

caribou, and wolves. 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 the only migration corridor between calving and wintering grounds. The isthmus is also an important winter foraging area for these animals. Moreover, the caribou are known to spend the entire winter on the isthmus.

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 isthmus and proposed road corridor. Bears frequently use the isthmus to forage and roam in search for food. While the low levels of human disturbance have helped maintain the high habitat value of this area for brown bears, roads generally have harmful impacts on large carnivores.<sup>13</sup> The construction of roads in what had been roadless brown bear habitat has been shown by many investigators to have significant adverse impacts on bear populations by increasing human access, which results in displacement of bears or the direct mortality of bears through legal hunting, defense-of-life-or-property (DLP) kills, illegal killing, and road kills.<sup>14</sup> Studies have demonstrated a strong relationship of road construction to increased bear mortality on northeastern Chichagof Island,<sup>15</sup> an increasing probability of brown bears killed in DLP with increasing road density on the Kenai Peninsula.<sup>16</sup>

Harbor seals, sea otters, Steller sea lions, and whales frequent the productive waters surrounding the Refuge. Sea otters, seals, and sea lions spend time along the coast and in the lagoons. Especially noteworthy is the fact that large numbers of threatened northern sea otters and harbor seals can be found near the entrance to Kinzarof Lagoon, while Steller sea lions use the barrier islands on the outside of Izembek Lagoon. Sea otters and Steller sea lions are federally protected under the Endangered Species Act. Additionally, numerous small streams along the north shore of Kinzarof Lagoon provide access routes to upland lakes for spawning sockeye salmon.

Many scientific studies have implicated roads as having negative effects on terrestrial and aquatic ecosystems.<sup>17</sup> According to the US Forest Service:

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<sup>13</sup> Noss, R., et al., Conservation biology and carnivore conservation in the Rocky Mountains, 10 CONSERVATION BIOLOGY 949–963 (1996). Trombulak, S., and C. Frissell, Review of ecological effects of roads on terrestrial and aquatic communities, 14 CONSERVATION BIOLOGY 18–30 (1999).

<sup>14</sup> McLellan, B. and D. Shackleton, Immediate reactions of grizzly bears to human activities, 17 WILDLIFE SOCIETY BULLETIN 269-275 (1989). McLellan, B., Relationships between human industrial activity and grizzly bears, 8 INTERNATIONAL CONFERENCE ON BEAR RESEARCH AND MANAGEMENT 57-64 (1990). Mattson, D., Human impacts on bear habitat use, 8 INTERNATIONAL CONFERENCE ON BEAR RESEARCH AND MANAGEMENT 33–56 (1990). Schoen, J., et al., Habitat-capability model for brown bear in Southeast Alaska, 9 INTERNATIONAL CONFERENCE ON BEAR RESEARCH AND MANAGEMENT 327–337 (1994). Mace, R., et al., Relationships among grizzly bears, roads and habitat in the Swan Mountains, Montana, 33 JOURNAL OF APPLIED ECOLOGY 1395-1405 (1996).

<sup>15</sup> Titus, K., and L. Beier, Population and habitat ecology of brown bears on Admiralty and Chichagof islands, Federal Aid in Wildlife Restoration, Research Progress Report W-23-4, Alaska Department of Fish and Game, Juneau, AK (1991).

<sup>16</sup> Suring, L., and G. Del Frate, Spatial analysis of locations of brown bears killed in defense of life or property on the Kenai Peninsula, Alaska, USA, 13 URSUS 237–245 (2002).

<sup>17</sup> E.g., Trombulak, S., and C. Frissell, Review of ecological effects of roads on terrestrial and aquatic communities, 14 CONSERVATION BIOLOGY 18–30 (1999). U.S. Forest Service, FOREST ROADS: A SYNTHESIS OF SCIENTIFIC INFORMATION, General Technical Report PNW-GTR-509, Pacific Northwest Research Station (2001).

Undesirable consequences [of roads] include adverse effects on hydrology and geomorphic features (such as debris slides and sedimentation), habitat fragmentation, predation, road kill, invasion by exotic species, dispersal of pathogens, degraded water quality and chemical contamination, degraded aquatic habitat, use conflicts, destructive human actions (for example, trash dumping, illegal hunting, fires), lost solitude, depressed local economies, loss of soil productivity, and decline in biodiversity.<sup>18</sup>

The proposed road is within a confined isthmus that is ecologically intact and serves as vital habitat for a number of vulnerable species; mitigation elsewhere is not possible. Over the long term, impacts associated with the road alternatives will likely generate population sinks or constitute ecological traps for many species that rely on this special place.

***b. Fulfilling International Treaty Obligations with Respect to Fish, Wildlife, and Their Habitats***

The Izembek Lagoon area of the Refuge is internationally recognized for its tremendous wildlife diversity, wilderness values, and critical wetlands. The lagoon complex and isthmus make up the ecological heart of the Refuge. For migratory birds, this relatively small area is unquestionably of global significance and has been repeatedly recognized as such. For example, in 1986, President Reagan named Izembek as the first Wetland of International Importance in the United States under the Ramsar Convention on Wetlands. In 1991, Izembek was named a “sister refuge” with Russia’s Kronotskiy State Biosphere Reserve under the U.S.–Russian Governmental Agreement on Cooperation in Environmental Protection. BirdLife International, in cooperation with the National Audubon Society, recognized Izembek as an Important Bird Area of global significance. The Refuge supports internationally important migratory birds that the U.S. has helped to protect in treaties such as the Migratory Bird Treaty Act.<sup>19</sup>

Hundreds of thousands of migratory waterfowl traveling the Pacific flyway use the Izembek and Kinzarof lagoon complex and its rich eelgrass beds as a fall staging area and as wintering grounds. The lagoons complex provides wintering, breeding, molting, refueling, staging, or resting grounds for:

- nearly the entire Pacific 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, including birds from Russia and Alaska, and many species of other shorebirds, including Pacific golden-plovers, rock sandpipers, dunlins; and
- a resident population of tundra swans.

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<sup>18</sup> U.S. Forest Service, *FOREST ROADS: A SYNTHESIS OF SCIENTIFIC INFORMATION*, General Technical Report PNW-GTR-509, Pacific Northwest Research Station (2001).

<sup>19</sup> 16 U.S.C. § 703, et seq.

Brant fly back and forth between the lagoons to forage; emperor geese use Kinzarof Lagoon while often foraging in the upland tundra area of the isthmus for crowberries; and the threatened Steller's eiders prefer Kinzarof. Both lagoons are essential to wildlife, and the lagoon complex comprises vital, high-quality habitat for many species due to the presence of some of the world's largest eelgrass beds. More than 98 percent of the world's Pacific black brant converge on Izembek Lagoon each year to feed on the eelgrass in preparation for their 3,000-mile, 55-hour non-stop flight to wintering grounds in Mexico. The birds feed on eelgrass for approximately eight weeks before their long flight south, which usually begins in early November. Emperor and Canada geese rely on the eelgrass and intertidal mudflats in the lagoons for nutrients, as do invertebrates and marine mammals. Many of the avian species using Izembek, including the dunlin, black brant, and Steller's eider, are recognized on Audubon's Alaska WatchList of declining and vulnerable bird populations. Eelgrass also 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 north side of the Alaska Peninsula is a key element in maintaining the productivity of the larger Bering Sea ecosystem. Degradation or loss of this complex could result in substantial population declines for species that rely on the area, as distant uplands or other lands offered in exchange do not offer comparable habitat components that these species need.

*c. Providing the Opportunity for Continued Subsistence*

Construction and use of the proposed 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 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. It is for this reason that the Association of Village Council Presidents (AVCP), the recognized tribal organization and non-profit Alaska Native Regional Corporation for 56 member Native villages in western Alaska, has consistently opposed the King Cove Road. In 1998, the AVCP passed a resolution opposing the road, and this opposition was reaffirmed in 2007 and again in 2008. It is noteworthy that many residents of the Y-K Delta live in communities with fewer and less reliable options for transportation and medical care than are found in King Cove.

The DEIS notes that subsistence use, the harvesting of natural resources, is central to the livelihood of many Alaska Native communities and other rural residents. However, this section falls short of providing a thorough analysis as to how the road will impact subsistence use. In fact, the report notes that the authors only reviewed the regulatory framework for subsistence uses in the project areas, that major studies on subsistence are over two decades old, and that the harvest survey and resource mapping for some communities require additional analysis for inclusion in the DEIS. However, the DEIS points out that “[i]ncreased harvesting pressure on streams could result from increased access, which could have a major adverse effect on fish resources.”<sup>20</sup> The DEIS further states that “[r]oad construction and operation would have a major adverse effect on Tundra Swan, Brant, Emperor Goose and Common Loon populations...”<sup>21</sup> Given the admitted lack of recent data on subsistence use, the expected reliance of communities on subsistence activities and the fact

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<sup>20</sup> DEIS at ES-23.

<sup>21</sup> DEIS at ES-23.

that the road will have major adverse impacts on wildlife, there is a compelling case to reject the proposed road and recommend the No Action Alternative.

*d. Ensuring Water Quality and Quantity*

Izembek and Kinzarof lagoons, their watersheds, and the isthmus which the proposed road would transect make up the ecological heart of the Refuge. The DEIS notes that direct effects from construction activities would increase the sediment load into surrounding streams that would continue to move throughout the system.<sup>22</sup> Further, it states that indirect effects on hydrologic resources would occur as the increase in sediment load from road runoff would impact the quality of receiving surface water bodies.<sup>23</sup> The report concludes that construction, operation, and maintenance of a road would permanently result in direct and indirect impacts to hydrologic resources and water quality of medium to high intensity and permanent duration.<sup>24</sup> The DEIS notes that if a spill were to occur on land, the impact would be high in intensity, and if the spill occurred in the wetlands or a water body, the impact would be long-term and high-intensity.

The impacts of the proposed road on the isthmus wetland complex of Izembek Refuge are underestimated in Alternatives 2 and 3. Although impacts are characterized as High for delineated wetlands, the overall impact to the complex is characterized as Medium. We believe that the impacts described in the DEIS and additional impacts we here describe would result in potentially high-level, permanent impacts across the region. As a Ramsar Wetland of International Importance, an Important Bird Area, federally designated Wilderness area, and national wildlife refuge, there is no question that this is a unique wetland complex. We therefore recommend that the summary for indirect effects from operation and maintenance for Section 4.3.2.2 Wetlands (Alt 2) and Section 4.4.2.2 (Alt 3) be modified to reflect that impacts are Medium to High.<sup>25</sup>

The DEIS reasonably assesses the value of the lower quality lands proposed for exchange. It is noteworthy that the wetlands that would be transferred to the Refuge System would likely remain wetlands without transfer for the next 35 years (the timespan for consideration of costs in the DEIS) based on the projected population and economic factors in the region. These wetlands might also be protected in the future as part of the Refuge System under other wetland mitigation programs resulting from compensatory mitigation under the Clean Water Act Section 404(b)(1), although we are not aware of specific intent to do so at this time.

While the direct impacts of the road are estimated to be only 3.8 acres of wetlands under Alternative 2,<sup>26</sup> and 2.4 acres under Alternative 3,<sup>27</sup> considering only the areas delineated on a map (and a low-resolution one at that) is contrary to the original intent of designating the entire isthmus region as Izembek Refuge to protect an intact watershed. Wetlands do not function as discreet features on the landscape, and the isthmus in Izembek Refuge is a wetland complex that includes the interaction between uplands where the water table may be higher than the adjacent lowland containing a wetland. Disruption of surface water flow in uplands may impact both surface and subsurface flows, with the latter being an equally important component of wetland hydrology in that

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<sup>22</sup> DEIS at 4-107.

<sup>23</sup> DEIS at 4-107.

<sup>24</sup> DEIS at 4-110.

<sup>25</sup> DEIS at 4-4.

<sup>26</sup> DEIS at 4-122.

<sup>27</sup> DEIS at 4-236.

groundwater may be the primary source of water in a lowland wetland.<sup>28</sup> Although the DEIS states that culverts are used to mitigate road impacts, there are still significant, even visible, impacts to wetlands when hydrologic flows are disrupted. Thus, it is unclear why the DEIS considers a 400-foot corridor for analysis, given the lack of characterization of the hydrology and thus wetland system function.<sup>29</sup> The impacts may extend far beyond this corridor in some areas and the uplands, especially within the vegetation classes identified, are an integral part of the structure and function of the wetland complex on the isthmus. Further if off-road vehicle or snow-machine use occurs off the road, there is potential for further disruption of hydrologic processes in this wetland complex.<sup>30</sup>

### **3. The Proposed Action Is Incompatible with the Mission of the Refuge System**

The National Wildlife Refuge System, established in 1903 and managed by the Service, is comprised of 556 refuges and 38 wetland districts. The Refuge System's unified mission, co-authored by Representatives Don Young (R-AK) and John Dingell (D-MI), while similar to that of the Service's, emphasizes administering a *national network of lands and waters* for the conservation, management, and where appropriate, the restoration of fish, wildlife, and plant resources and their habitats within the U. S. for the benefit of present and future generations of Americans. Within that network, located on the Alaska Peninsula is the Izembek Refuge; its wild lands and waters sustain a rich diversity of species. An essential anchor of biodiversity and wildness within the Refuge System, the Izembek Refuge's conservation benefits extend beyond its boundaries. Not only do the Refuge lands contribute to the subsistence lifestyle of Alaska Natives and other rural residents, but its wetlands and wildlife habitat are also nationally and internationally recognized natural resources. The Service has a duty to uphold the Refuge System's mission to conserve fish, wildlife, and plant resources and their habitats, and administer a network of land. The land exchange and road construction would undermine this mission.

### **4. The Proposed Action Erodes Wilderness Protection**

Congress passed the Wilderness Act "to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition."<sup>31</sup> Federal agencies must manage Wilderness areas:

for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use and enjoyment as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness...<sup>32</sup>

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<sup>28</sup> Winter, T.C., A Conceptual Framework for Assessing Cumulative Impacts on the Hydrology of Nontidal Wetlands, 12 ENVIRONMENTAL MANAGEMENT 605-620 (1988).

<sup>29</sup> DEIS at 3-57.

<sup>30</sup> Arp, C.D. and T. Simmons, Analyzing the impact of Off-Road Vehicle (ORV) Trails on Watershed Processes in Wrangell-St. Elias National Park and Preserve, Alaska, Environmental Management, DOI 10.1007/s00267-012-9811-z (2011).

<sup>31</sup> 16 U.S.C. § 1131(a).

<sup>32</sup> Id.

Permanent roads and commercial enterprises are expressly prohibited in designated Wilderness.<sup>33</sup> Therefore, to build a road as outlined in Alternatives 2 and 3 in the DEIS, the affected areas must be “de-designated” and removed from the Wilderness System. This end-run around the prohibition against permanent roads in designated Wilderness is clearly not in the public interest, as it sets a precedent for de-designating Wilderness areas when development pressures arise, essentially relegating Wilderness to an ephemeral rather than permanent status. The first sentence of the Wilderness Act clearly states: “An Act to establish a National Wilderness Preservation System for the permanent good of the whole people and for other purposes.” The proposed land exchange and road undermine the purpose and intent of the Wilderness Act and would threaten the viability of—and the public’s confidence in—the Wilderness System as a whole. In fact, the proposed land exchange would be the first “de-designation” of Wilderness for the sake of allowing a development project to proceed. Such an action is antithetical to Wilderness designation and the protections afforded by the Wilderness Act.

Because approximately 95 percent (approximately 300,000 acres) of Izembek Refuge is designated Wilderness, the Refuge’s Comprehensive Conservation Plan (CCP) directs that the area be managed to maintain wilderness resources and values, preserve the wilderness character of the Refuge, and provide opportunities for research and recreation. The CCP explicitly notes that the designated Wilderness of the Refuge contains many of the Refuge’s special values, including pristine streams, extensive wetlands, steep mountains, tundra, and sand dunes. A road corridor threatens these values and undermines the purposes for which Izembek Refuge was established, including as a designated Wilderness.

## **B. The Proposed Land Exchange and Road Would Sacrifice Land Quality for Land Quantity**

An objective evaluation of the land exchange and road proposal cannot be achieved by considering only the amount of land that would be removed from the Refuge versus the amount that would be added. Rather, consideration must be given to the quality of the lands to be exchanged; the total impacts of road construction, operation, and maintenance, as well as the individuals or entities who will bear these costs; and the effects of increased public use, both legal and illegal, that would occur within the most vital area of the Izembek Refuge and Wilderness. These impacts must be considered together with the lower quality of the lands that would be added, the lack of credible threats to these lands for the foreseeable future, existing protective benefits of Section 22(g) that would continue if the King Cove Corporation lands and selections were not transferred, and the fact that some of the lands to be added would come with less than ideal capability for protection, such as submerged lands remaining in State ownership and some lands with the subsurface remaining in Aleut Corporation ownership. Thus, any benefits that might occur from this land exchange are far outweighed by the impacts of a road in the heart of the most important and vulnerable wildlife habitat within Izembek Refuge’s Wilderness.

The proposed land exchange would add approximately 43,093 acres of land owned by the State of Alaska to the Alaska Peninsula National Wildlife Refuge and designate these lands as Wilderness. The State of Alaska would retain ownership of submerged lands including tidelands, lakes, rivers, and streams. These lands are located to the north of the Izembek Refuge and were not included within the original boundary for obvious reasons: they do not contribute in a significant manner to

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<sup>33</sup> See 16 U.S.C. § 1133(c).

the habitat values and conservation purposes of the Izembek Refuge. The DEIS acknowledges the lower habitat values of these lands: “The southern half is primarily upland habitat and includes areas at higher elevations than any other parcels discussed in the EIS. It likely does not provide much habitat for waterfowl or other waterbirds...”<sup>34</sup> The value of wetlands associated with the State lands are also rated lower: “this value is somewhat less than wetlands that are in closer proximity to Izembek and Kinzarof lagoons, which are used more extensively by migratory birds and designated as Internationally Important Wetlands.”<sup>35</sup> These lands would in no way “compensate” for the lands and habitats lost to road construction should Alternative 2 or 3 be implemented.

Also proposed in the land exchange is the addition of approximately 13,300 acres of land (surface estate, but not tidelands, and submerged land of rivers, streams and lakes) owned by King Cove Corporation to the Refuge. The King Cove Corporation would also relinquish its selection of 5,430 acres in the Izembek Wilderness. While these lands are recognized for having some habitat values, any additional contribution they would make to the Refuge is of questionable merit. For example, a significant portion of the King Cove Corporation lands and selection lands were formerly part of the Izembek Refuge and are therefore subject to the protective provisions of Section 22(g) of the Alaska Native Claims Settlement Act (ANCSA). A U.S. District Court ruling that nullified the St. Matthew Island land exchange centered on the failure of the government to properly weigh the conservation value of Section 22(g).<sup>36</sup> Failure to properly assess the implications of Section 22(g) creates an exaggeration of potential benefits to conservation from exchange of King Cove lands, at the expense of accurately describing the consequences.

The DEIS acknowledges that some of the King Cove lands that would be transferred to the Refuge have been managed for shareholder use, especially the Kinzarof Lagoon and Mortensen’s Lagoon parcels, which have various cabins and old military structures present.<sup>37</sup> However, the document fails to clearly indicate that these lands, which would become Wilderness under the proposed land exchange, have lower wilderness quality than the existing Wilderness lands that would be lost to road construction. This is yet another example of the DEIS providing an incomplete evaluation of the proposed exchange and creating the false impression that net benefits to Wilderness would occur. In fact, the opposite is true.

The value of the land exchange for conservation is further reduced because the King Cove Corporation lands previously conveyed from the Alaska Peninsula National Wildlife Refuge are not subject to the benefits of Section 22(g), and the subsurface estate of these lands will remain under the ownership of the Aleut Regional Corporation. Development rights of subsurface resources by the Aleut Regional Corporation at any time would result in significant impact to refuge resources and values. This legal reality greatly diminishes the actual conservation value that might be available to the Alaska Peninsula National Wildlife Refuge from the proposed land exchange.

We understand that King Cove Corporation intends to take its 5,430-acre entitlement from lands currently in the Alaska Peninsula National Wildlife Refuge that are located east of Frosty Peak. These lands would not be subject to Section 22(g) of ANCSA and thus would lose any resource protections that had been afforded by remaining within the Alaska Peninsula National Wildlife

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<sup>34</sup> DEIS at 3-140.

<sup>35</sup> DEIS at 3-90.

<sup>36</sup> *National Audubon Society v Hodel*, 606 F. Supp. 825 (D. Alaska 1984).

<sup>37</sup> DEIS at 3-350.

Refuge. Before a complete and accurate analysis of the environmental impacts of the proposed action can be made, information regarding the specific lands to be reclaimed by King Cove must be presented to the public. Taking of other lands from the Alaska Peninsula National Wildlife Refuge will significantly reduce any perceived benefits that may be associated with the proposed land exchange, road construction, operation, and maintenance.

If Alternative 2 or 3 is authorized, there will be many significant impacts to Izembek Refuge, including lands that would be acquired by the Refuge. The DEIS correctly identifies increased impacts of all-terrain vehicle trails within the existing Wilderness and adjacent lands that are apparently a direct consequence of recent road construction on King Cove Corporation lands.

In addition, since 2006, after the partial completion of the road along the east side of Cold Bay, numerous all-terrain vehicle tracks have been observed and documented (Sowl 2011f) extending out from the hovercraft terminal site and approximately 4 miles inland from the coast. This recent all-terrain vehicle use has been concentrated on wet or moist graminoid areas, likely due to ease of travel on these cover types. Multiple tracks indicating frequent passages are concentrated within the Izembek Wilderness along the east side of Kinzarof Lagoon and extending to the northeast into the Joshua Green River watershed.<sup>38</sup>

It is entirely likely that expansion of such impacts will occur on the King Cove Corporation lands proposed to be added to the Refuge and that these impacts will extend over time to broader areas of the Refuge and Wilderness if a land exchange and road are approved. This would significantly negate many of the claimed benefits that would result from an exchange of lands.

In short, the Refuge and Wilderness area presently support globally significant populations of migratory birds, as well as other wildlife. The proposed exchange lands in Alternatives 2 and 3 would not provide comparable habitat nor compensate for the loss or degradation of the lagoon complex. 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. Removing these protections is clearly not in the public interest.

### **C. The Congress and Taxpayers Provided a Solution to the Health and Safety Concerns**

The King Cove Health and Safety Act appropriated \$37.5 million of federal funds to improve King Cove's medical facilities and create a reliable marine link between the village and Cold Bay. After passage of the King Cove Health and Safety Act, Alaska Senator Ted Stevens sponsored a rider on an appropriations bill that directed a 17-mile road be built from King Cove to a hovercraft terminal. Construction for this road began in March 2004. More than \$25 million dollars have been spent for this road, which remains unfinished, and it is estimated that a completed road would eventually cost \$50 million. Construction costs continued to escalate as crews confronted numerous obstacles, including unstable volcanic soils in the area. Avoiding the unstable soils required rerouting the road onto Cold Bay's sensitive shoreline, where winter ice scouring and spray will increase road maintenance costs, especially as sea levels rise.

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<sup>38</sup> DEIS at 3-42.

#### **D. The Proposed Land Exchange and Road Are Unnecessary**

The funds appropriated under the King Cove Health and Safety Act allowed Aleutians East Borough (AEB) to purchase a \$9 million state-of-the-art hovercraft, capable of carrying 50 passengers and an ambulance and traveling in wave heights up to 10 feet and in winds over 45 miles per hour. The hovercraft began operating in 2007 and performed successfully in each of the more than 30 medical evacuations for which it was used. According to the attached AEB meeting minutes from March 13, 2008, the AEB mayor stated that the hovercraft is a “lifesaving machine” and “is doing what it is supposed to do.” The hovercraft is one of the multiple options King Cove residents have for emergency medical response.

#### **E. The Proposed Land Exchange and Road Would Not Guarantee Year-round, Reliable Access between the King Cove and Cold Bay Communities**

Throughout the DEIS, the Service states that King Cove residents are seeking affordable and reliable emergency transportation.<sup>39</sup> However, the proposed road would not ensure year-round, safe access between King Cove and Cold Bay. At times when the weather is harshest, including high winds, low visibility, and heavy precipitation, a road is unlikely to be a reliable or safe alternative.

The statement in the DEIS that “road transportation is almost always available, assuming regular and timely maintenance” does not appear to be substantiated for this region and should be revised.<sup>40</sup> The Service should explain and/or document the likely reliability of road transportation based on observed conditions in the region, such as high winds, fog, reduced visibility, snow squalls, the ability of local road maintenance equipment to keep a new road open in addition to maintaining existing transportation corridors (airports, existing roads, public parking, etc.).

A road should not be constructed through fragile rolling tundra dotted with wetlands, prone to high snowdrifts. The road would also traverse areas of steep slopes and unstable volcanic soils prone to avalanches. Travel time between the two communities is expected to take more than two hours in the best circumstance.<sup>41</sup> The road would be totally impassable during frequent icing, blowing snow, and slides that are common on the proposed route. Severe winter storms and high waves would likely produce serious damage that would close it for long periods of time and result in exorbitant repair and maintenance costs for the life of the road. In a medical emergency, the 20-minute ride in the hovercraft would be shorter and more reliable.

## **II. THE DEIS FAILS TO PROVIDE A THOROUGH AND OBJECTIVE ANALYSIS OF THE PROPOSED ACTION**

A thorough and objective evaluation of the proposed land exchange and road corridor alternatives will clearly show that such actions would weaken the Service’s ability to fulfill its statutory responsibilities and are not in the public interest. Unfortunately, such an evaluation cannot be found in the DEIS. The current analysis relies on incomplete, outdated, and biased information that cannot reasonably be expected to inform a decision that fulfills agency mandates and serves the

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<sup>39</sup> E.g., DEIS at 4-73.

<sup>40</sup> DEIS at 4-75.

<sup>41</sup> DEIS at 4-74 (Table 4.2.3-8).

public interest. The Service must ensure that any inadequacies with the draft document are remedied in the Final EIS. Described below are just a few of the issues that must be resolved.

#### **A. The Service Must Prepare a Compatibility Determination**

The Service must prepare a compatibility analysis and determination for the proposed land transfer and road corridor. Compatibility determinations are used to ensure that the purposes of the Refuge and the mission of the National Wildlife Refuge System are met. According to Refuge System policy,

[u]ses that we reasonably may anticipate to conflict with pursuing this directive to maintain the ecological integrity of the System are contrary to fulfilling the National Wildlife Refuge System mission and are therefore not compatible. Fragmentation of the National Wildlife Refuge System's wildlife habitats is a direct threat to the integrity of the National Wildlife Refuge System, both today and in the decades ahead. Uses that we reasonably may anticipate to reduce the quality or quantity or fragment habitats on a national wildlife refuge will not be compatible.<sup>42</sup>

The proposed land transfer and subsequent road corridor falls within the extremely broad definition of “refuge use” found in federal regulations.<sup>43</sup> These regulations define a refuge use as “a recreational use [], refuge management economic activity, or other use of a national wildlife refuge by the public or other non-National Wildlife Refuge System entity.”<sup>44</sup> Under the 1997 National Wildlife Refuge System Improvement Act, “[t]he Secretary shall not initiate or permit a new use of a refuge or expand, renew, or extend an existing use of a refuge, unless the Secretary has determined that the use is a compatible use and that the use is not inconsistent with public safety.”<sup>45</sup> A compatible use is “a wildlife-dependent recreational use or any other use of a refuge that, in the sound professional judgment of the Director, will not materially interfere with or detract from the fulfillment of the mission of the System or the purpose of the refuge.”<sup>46</sup>

A previous EIS prepared for a land exchange on Yukon Flats National Wildlife Refuge indicated that the Service was not required to prepare a compatibility determination because the land exchange was considered a refuge management activity, rather than a refuge use. A refuge management activity is defined as “an activity conducted by the Service or a Service-authorized agent to fulfill one or more purposes of the national wildlife refuge, or the National Wildlife Refuge System mission.”<sup>47</sup> Examples of refuge management activities include “prescribed burning; water level management; invasive species control; routine scientific monitoring, studies, surveys, and censuses; historic preservation activities; law enforcement activities; and maintenance of existing refuge facilities, structures, and improvements.”<sup>48</sup> The land transfer at issue cannot be considered a refuge management activity because the proposed land exchange and road corridor do not fulfill either the purposes of Izembek Refuge or the Refuge System mission. As demonstrated by the examples listed

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<sup>42</sup> U.S. Fish and Wildlife Service, 603 FW 2.5 Compatibility (2000).

<sup>43</sup> 50 C.F.R. § 25.12.

<sup>44</sup> *Id.*

<sup>45</sup> Pub. L. No. 105–57 § 6(3)(A)(i).

<sup>46</sup> *Id.* at § 5(1).

<sup>47</sup> U.S. Fish and Wildlife Service, 603 FW 2 Compatibility (2000).

<sup>48</sup> *Id.* at 2.10.

in Service policy, management activities are those activities necessary to maintain the purpose of the Refuge, not undermine it. Altering the boundaries of the Refuge and constructing a road corridor through ecologically sensitive habitat is a major decision with significant ecological consequences, one that is not akin to the types of activities described in the policy.

Furthermore, the fact that the Secretary of the Interior is required to prepare a public interest determination does not relieve the Service of the requirement to prepare a compatibility determination for this action. The 2009 Omnibus Public Lands Management Act requires the Secretary to comply with the National Environmental Policy Act (“NEPA”) and any other applicable laws and regulations, except for valuation requirements.<sup>49</sup> The valuation exception is the only exception contained in the Act.<sup>50</sup> The provision requiring a public interest determination does not state or imply that a compatibility determination will no longer be required or that it is being replaced with a public interest determination; the public interest is merely an additional consideration.<sup>51</sup>

The DEIS correctly cites regulations that preclude consideration of the Refuge System mission for uses of 22(g) lands in compatibility determinations.<sup>52</sup> However, the lands that would be transferred from Izembek Refuge and directly impacted by the proposed road are not 22(g) lands, and the compatibility determination must therefore consider whether the use is compatible both with the Refuge’s purposes and the Refuge System mission.

For these reasons, the proposed land transfer and road corridor are not exempt from a compatibility determination. Compatibility determinations are essential for actions, such as this one, that will have significant ecological consequences and that may be inconsistent with the Refuge’s purposes.

## **B. The Final EIS Must Fully Assess the Impacts to Wetlands, Hydrology, and Soils**

The impacts to wetlands and hydrologic processes projected for Alternatives 2 and 3 have been significantly underestimated. We attribute this underestimation to a lack of information about the hydrology of the isthmus, especially subsurface conditions, and its soils. It is not in the public interest to build a road through the Izembek Wilderness and wetlands when the impacts cannot be reasonably determined. Allowing a road in the absence of the information necessary for the Service to properly evaluate the environmental consequences is in violation of the National Environmental Policy Act (NEPA).

Information presented on “Hydrology/Hydrologic Processes” is derived from topographical maps prepared by the USGS at a 1:63,360 scale.<sup>53</sup> These data make it possible to identify approximate stream locations and the surface flow hydrologic boundary between Izembek and Kinzarof lagoons,<sup>54</sup> but are inadequate for characterizing the integrated ground and surface hydrology of the isthmus. The isthmus region is within one hydrologic unit (HU 1930101), which suggests that the hydrology across the isthmus is interconnected, likely at the subsurface level. The Final EIS should

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<sup>49</sup> Pub. L. No. 111-11 § 6402(b).

<sup>50</sup> *Id.*

<sup>51</sup> *Id.* at 6402(d).

<sup>52</sup> DEIS at 3-193. 50 C.F.R. § 25.21.

<sup>53</sup> DEIS at 3-17 to 3-22.

<sup>54</sup> DEIS at 3-20 (Figure 3.1-3).

clarify this, as well as more clearly project the implications of bisecting the Kinzarof Lagoon sub-watershed under Alternative 2 and of impacting both Izembek Lagoon and Kinzarof Lagoon sub-watersheds under Alternative 3.

Discrepancies regarding soil type exist between the 1979 National Cooperative Soil Survey (NCSS) information provided in the DEIS and information collected by consultants on behalf of the Aleutians East Borough (AEB). The AEB consultant reports describe the soil type as gravelly sands and sandy silts overlain by soft organic peat and silt.<sup>55</sup> The NCSS describes the soils as Fibrists (peats) overlying volcanic ash. Volcanic ash soils can be unstable not only during seismic activity as stated in the DEIS, but also when agitated, such as during construction and operation of roads. Ashes that weather into allophanic clays are highly sensitive to disturbance and heavy compaction, such as occurs when roads are constructed. These materials should be avoided and are generally not recommended for road construction.<sup>56</sup> Classification of soils is important, as soil type will affect both the stability and lifespan of the road, as well as interpretation of the impacts to hydrology, especially groundwater recharge and water quality impacts, and wetland function. To better assess the impacts of a road across the isthmus in Alternatives 2 and 3, a more comprehensive soil study is needed.

### **C. The Final EIS Must Fully Assess the Impacts to Wildlife**

The Final EIS should acknowledge that habitat loss resulting from the road alternatives cannot be mitigated because such losses are permanent and new habitat cannot be created or enhanced elsewhere without displacing other swans or impacting other species using the confined isthmus area. Much of the impact to tundra swans associated with the road alternatives is due to inherent sensitivity of these birds to human disturbances and the strong likelihood that the road will bring increased human activities such as wildlife viewing, sport and subsistence hunting, as well as expanded use of ATVs for subsistence access in spite of attempts to prevent such access. Given these circumstances, the Final EIS must reaffirm the finding that the impacts to tundra swans that are associated with the road alternatives will be major and highly significant.

Further, we disagree that the mitigation measures identified in the Omnibus Public Land Management Act of 2009 will minimize the adverse impacts of the road corridor on adjacent refuge lands, especially a cable barrier or other physical barrier on each side of the road as a mitigation measure to avoid impacts to wildlife and to mitigate wetland loss. Because it is highly likely that if a road is built some users will attempt to leave the road to access wildlife on the Refuge, a barrier is intended to keep vehicles on the road, thus preventing disturbance to wildlife and destruction of wetlands and vegetation. However, a barrier along the road will also serve as a movement barrier to wildlife such as bears and caribou, and thus may have an equal impact as off-road vehicle use on wildlife. Further, anyone driving roads where there is snow removal and maintenance equipment in use, or in rural areas where there is little traffic enforcement available, knows that maintaining the

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<sup>55</sup> Miller, Duane and Associates, Geotechnical Exploration, King Cove to Cold Bay Access, King Cove, Alaska, report prepared for Aleutians East Borough (2000). Miller, Duane and Associates, Geotechnical Exploration-Supplement, Access Road King Cove, Alaska, report prepared for Aleutians East Borough, (December 18, 2003). Golder Associates, Draft Final Data Report for Geotechnical Investigations, Rock Mapping and Potential Quarry Site Evaluations, King Cove Access Road Completion, King Cove, Alaska, prepared for USKH, Inc. (July 30, 2010).

<sup>56</sup> Robinson, R. and B. Thagesen. 2004. Road Engineering for Development, 2<sup>nd</sup> Edition. CRC Press, 544p,(see p. 175).

integrity of a barrier is a significant challenge. Because the maintenance will not be the responsibility of the USFWS, it will be difficult to ensure this mitigation measure is enforced or achievable. This barrier will also have significant impacts on the wilderness values of Izembek as it would be visible from the Refuge, although not having it would also result in significant impacts. Due to the magnitude of significant unavoidable impacts that cannot be effectively mitigated, the proposed land exchange should not be completed.

#### **D. The Final EIS Must Fully Assess Other Impacts of the Proposed Action**

In discussing the environmental consequences of Alternatives 2 and 3, the DEIS fails to consider the potential for spills of hazardous materials that may be transported on the road once it is open to access.<sup>57</sup> These materials may include not only fuels, but also chemicals transported for use in municipal and commercial operations, and other hazardous materials.

Similarly, the DEIS fails to account impacts from off-road vehicles (ORVs) to the vegetation, wildlife and other refuge resources. The DEIS should include information from and reference to the impact analysis of off-road vehicles for subsistence purposes on refuge lands and resources prepared by Sowl and Poetter.<sup>58</sup> This analysis and the references within is critical for evaluating the potential impacts of ORVs traveling on and adjacent to a road corridor through the isthmus, not just for subsistence use but in case of trespass into refuge lands as well. This report concluded that:

Allowing use of ORVs off established roads and trails within Izembek Refuge is unwarranted and could be detrimental to key fish and wildlife species found within the Refuge. Unregulated ORV access would significantly increase consumptive use of fish and wildlife resources, significantly expand the portion of the Refuge experiencing human disturbances, substantially increase damage to habitats, increase displacement of animals from preferred habitats, disrupt animal movements, and put extra stress on populations that are engaged in energetically demanding activities such as breeding, molting, migration, and overwintering.

Further, noise disturbance from ORVs, including ATVs and motorcycles, and snow machine use on the road must be considered. ATVs and motorcycles have noise emissions near 100 dB immediately next to the vehicle and decrease to approximately 80 dB 50 feet away.<sup>59</sup> Snow machines produced after 1976 that are in good working order and certified by the Snowmobiles Safety and Certification Committee's independent testing company emit no more than 73 dB(A) at 50 feet while traveling at 15 mph when tested under SAE J-1161 procedures, but the disturbance may still be harmful to wildlife.<sup>60</sup>

Although different species react differently to human presence, it is safe to say that the effects of the road will extend well beyond the physical road footprint. Increased human presence, particularly during times of the year when wildlife is especially sensitive and their energetic needs are high

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<sup>57</sup> DEIS at 4-111 to 4-113, and 4-230.

<sup>58</sup> Sowl, K. and R. Poetter, *Impact Analysis of Off-Road Vehicle Use for Subsistence Purposes on Refuge Lands and Resources Adjacent to the King Cove Access Project* (2004).

<sup>59</sup> Wayle Laboratories, *CALIFORNIA OFF-HIGHWAY VEHICLE NOISE STUDY*, Prepared for the State of California Department of Parks and Recreation (2005).

<sup>60</sup> *Id.*

(molting, nesting, and migration staging for birds; calving season for caribou) would have negative impacts on these populations.

It is insufficient to list direct or indirect effects; the Service must consider the cumulative impacts of *all* of the impacts from road-building. These include not only impacts from human activities, but also the increase of predators that tend to thrive near human activity, such as common ravens and foxes, which would increase predation pressure on birds during nesting season when eggs and chicks are vulnerable, as well as during molting season when waterfowl are flightless as they grow new feathers.

## **E. The Final EIS Must Consider and Analyze the Impacts of Climate Change**

Secretarial Order 3289 states that “[e]ach bureau and office of the Department [of the Interior] must consider and analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, developing multi-year management plans, and making major decisions regarding potential use of resources under the Department’s purview.” However, the DEIS’s consideration of climate change and its impact on the Izembek Refuge is woefully inadequate. The sub-Arctic is experiencing a cascade of related impacts from climate change that are altering the nature and function of the ecosystem. In addition to atmospheric warming, greenhouse gas emissions are leading to warmer waters, rapidly melting sea ice, increased frequency of extreme weather events, and ocean acidification, all of which have negative impacts on the Izembek environment and wildlife. Rising sea levels will have substantial impacts on the maintenance and viability of the proposed road system, especially those sections that must be located near tidewater. Without considering these changes and how they will interact with the proposed alternatives, the Service cannot make an informed decision about the relative impacts of the various alternatives.

### **1. The EIS Must Consider the Viability of a Road Corridor in the Context of Sea-Level Rise**

Alternatives 2 and 3 propose road corridors through a narrow isthmus between Izembek and Kinzarof lagoons; however, the DEIS fails to consider potential inundation and erosion of this land due to the very real and measurable threat of sea-level rise. The Final EIS should include data pertaining to land elevation, rate of sea-level rise, and tectonic subsidence and uplift to evaluate risks to the road and surrounding land. Given that construction of a road is the underlying reason for developing this EIS, it is essential that Service analyze the long-term viability of such a road.

The DEIS asserts that the lifecycle of the road, in both Alternatives 2 and 3, is expected to be greater than 50 years.<sup>61</sup> If a road is likely to be inundated or experience erosion due to sea-level rise in that timeframe, Alternatives 2 and 3 as described in the DEIS would provide only a short-term and unreliable link between the Cold Bay and King Cove communities. Questions then arise as to if and how the road would be maintained as inundation or erosion occur, whether the road would be preserved through the construction and long-term maintenance of sea walls or other structures, how such actions would further impact the ecosystem, and how much these would add to the true cost of these alternatives.

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<sup>61</sup> DEIS at 2-32 and 2-39.

## 2. The EIS Must Consider the Ecological Impacts of Climate Change

Although the Service makes some attempt to consider the greenhouse gases that will be produced by the various alternatives, it does not consider how the climatic changes already occurring will interact cumulatively with the proposed road and land exchange to impact Izembek Refuge. While natural systems and organisms exhibit a certain level of resiliency in the face of such disturbances, the additional pressure of climate change threatens to push them toward thresholds beyond which they will be unable to recover.<sup>62</sup> Examples of the synergistic effects of climate and other stressors have already been documented, and there is evidence that multiple stressors can produce ecosystem change of a greater magnitude than would be expected by summing their individual effects.<sup>63</sup> Limiting such stressors, as in Alternative 1, would preserve the ecological integrity and resiliency of Izembek Refuge's relatively undisturbed habitat, which will help vulnerable species that depend on it adapt to the drastic climatic changes they face.

Climate change and ocean acidification represent significant long-term threats to the survival of many of the species in Izembek Refuge. Climate change is affecting the far northern latitudes at a greater rate than the rest of the world. Over the past 50 years, Alaska has warmed at more than twice the rate of the rest of the national average.<sup>64</sup> Annual average temperature in Alaska has increased 1.9°C, while winters have warmed by 3.5°C, which has contributed to earlier spring snowmelt, sea-ice loss, widespread glacier retreat, and permafrost warming.<sup>65</sup> This trend is expected to continue.

Climate projections prepared for Izembek Refuge by The Wilderness Society based on data from a composite of five down-scaled global circulation models were used to estimate average future temperature and precipitation. These models assume a steady increase in carbon dioxide (CO<sub>2</sub>) emissions from fossil fuel combustion over the first several decades of the 21<sup>st</sup> century, followed by a gradual decline in emissions as low-carbon energy alternatives become more prevalent.<sup>66</sup>

Average temperature in the region is projected to increase at a rate of about 1°F per decade. Average annual temperature is expected to rise by about 5°F by 2040 and as much as 8°F by 2080. A likely outcome of these changes is a lengthening of the growing season by up to a month, a change that could have profound effects on wildlife mating cycles, plant growth and flowering, water availability in soil and rivers, and hunting and fishing.

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<sup>62</sup> Fagre, D.B., et al., THRESHOLDS OF CLIMATE CHANGE IN ECOSYSTEMS, A REPORT BY THE U.S. CLIMATE CHANGE SCIENCE PROGRAM AND THE SUBCOMMITTEE ON GLOBAL CHANGE RESEARCH, U.S. Geological Survey, Reston, VA (2009).

<sup>63</sup> Przeslawski, R., et al., Synergistic Effects Associated with Climate Change and the Development of Rocky Shore Molluscs, 11 GLOBAL CHANGE BIOLOGY 515-522 (2005). Russell, B.D., et al., Synergistic Effects of Climate Change and Local Stressors: CO<sub>2</sub> and Nutrient-driven Change in Subtidal Rocky Habitats, 15 GLOBAL CHANGE BIOLOGY 2153-2162 (2009).

<sup>64</sup> Karl, T.R., J.M. Melillo, and T.C. Peterson (eds.), GLOBAL CLIMATE CHANGE IMPACTS IN THE UNITED STATES, U.S. Global Change Research Program, Cambridge University Press (2009).

<sup>65</sup> Id.

<sup>66</sup> This emissions outlook is the "A1B" scenario from the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment, published in 2007. The models used in this analysis included Echem5, Gfdl2.1, Miroc3.2MR, HadCM3, and CGCM3.1 and data are available through the Scenarios Network for Alaska and Arctic Planning at the University of Alaska Fairbanks.

Average winter temperatures are projected to change the most, producing more ice and rain-on-snow events, which would be detrimental for over-wintering species. Mean winter temperatures are likely to cross the freezing threshold, increasing from an historical average of ~31°F to well above freezing (38°F). Growing season precipitation is unlikely to change much, resulting in drier conditions. Although summer rainfall is expected to rise by 10%, this increase is unlikely to be enough to offset an increase in water losses due to evapotranspiration caused by warmer temperatures and a longer growing season. Ultimately, the timing and intensity of precipitation will determine how the landscape and hydrology of the Refuge will be affected. These temperature changes will result in a variety of additional impacts to the vegetation and wildlife in Izembek Refuge.

The rapid decline in arctic sea ice is one of the most striking and visible indicators of global climate change, and sea-ice loss is having profound impacts on wildlife in the sub-Arctic and Arctic. Sea ice is critically important for numerous species including ice seals, sea ducks, whales, and invertebrates, all of which depend on sea ice for important life processes such as feeding, breeding, giving birth, rearing young, resting, and sheltering. In 2007, summer sea ice reached a stunning record minimum,<sup>67</sup> and the ice extent has not recovered. Overall, September sea-ice extent during 1979 to 2010 declined at a rate of 81,400 km<sup>2</sup> (31,400 mi<sup>2</sup>) per year, or 11.5 percent per decade relative to the 1979 to 2000 average.<sup>68</sup> Many studies now project that arctic summer sea ice will disappear almost completely in the 2030s.<sup>69</sup> Winter sea ice is also declining faster than Intergovernmental Panel on Climate Change (IPCC) climate models projected.<sup>70</sup> In the Bering Sea, winter (March and April) sea-ice cover is expected to decline by approximately 43 percent by 2050 under a mid-range A1B emissions scenario.<sup>71</sup> Arctic and sub-arctic shorelines are eroding at an accelerating rate due to the combined effects of sea-ice loss, increasing sea-surface temperatures, increasing terrestrial permafrost degradation, rising sea levels, and increases in storm power and corresponding wave action.<sup>72</sup> Increasing coastal erosion jeopardizes species that use coastal habitats such as the Izembek Refuge.

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<sup>67</sup> National Snow and Ice Data Center, Arctic sea ice shatters all previous record lows, Press release, Boulder, CO, available at [http://www.nsidc.org/news/press/2007\\_seaiceminimum/20071001\\_pressrelease.html](http://www.nsidc.org/news/press/2007_seaiceminimum/20071001_pressrelease.html) (October 1, 2007). Comiso, J. C., et al., Accelerated decline in the Arctic sea ice cover, *GEOPHYSICAL RESEARCH LETTERS* 35, L01703, doi:10.1029/2007GL031972 (2008).

<sup>68</sup> National Snow and Ice Data Center, Weather and feedbacks lead to third-lowest extent, available at <http://nsidc.org/arcticseaicenews/2010/100410.html> (2010).

<sup>69</sup> Stroeve, J., et al., Arctic sea ice extent plummets in 2007, *EOS TRANSACTIONS, AGU* 89:13-14 (2008). Lindsay, R. W., et al., Arctic sea ice retreat in 2007 follows thinning trend, *22 JOURNAL OF CLIMATE* 22:165-176 (2009). Wang, M., and J. E. Overland, A sea ice free summer Arctic within 30 years? *JOURNAL OF GEOPHYSICAL RESEARCH* 36, L07502, doi:10.1029/2009GL037820 (2009). Zhang, X., Sensitivity of arctic summer sea ice coverage to global warming forcing: towards reducing uncertainty in arctic climate change projections, *62A TELLUS SERIES A-DYNAMIC METEOROLOGY AND OCEANOGRAPHY* 220-227 (2010).

<sup>70</sup> Stroeve, J., et al., Arctic sea ice decline: Faster than forecast, *GEOPHYSICAL RESEARCH LETTERS* 34, L09501, doi: 10.1029/2007GL029703 (2007).

<sup>71</sup> Wang, M., J. E. Overland, and N. A. Bond, Climate projections for selected large marine ecosystems, *79 JOURNAL OF MARINE SYSTEMS* 258-266 (2010).

<sup>72</sup> Jones, B. M., et al., Increase in the rate and uniformity of coastline erosion in Arctic Alaska, *GEOPHYSICAL RESEARCH LETTERS* 36, L03503, doi:10.1029/2008GL036205 (2009).

Sea-level rise in many regions of the Arctic and sub-Arctic is advancing much faster than the global average, with particularly rapid increases in sea level occurring in recent years.<sup>73</sup> Although the IPCC Fourth Assessment Report projected a global mean sea-level rise in the 21<sup>st</sup> century of 18-59 cm, the IPCC acknowledged that this estimate did not represent a “best estimate” or “upper bound” for sea-level rise because it assumed a negligible contribution from the melting of the Greenland and west Antarctic ice sheets.<sup>74</sup> Recent studies documenting the accelerating ice discharge from the Greenland and Antarctic ice sheets indicate that the IPCC projections are a substantial underestimate.<sup>75</sup> Recent studies have attempted to improve upon the IPCC estimates and have found that a mean global sea-level rise of at least one to two meters is highly likely within this century.<sup>76</sup> Studies that have reconstructed sea-level rise based on the geological record, including oxygen isotope and coral records, have found that larger rates of sea-level rise of 2.4-4 m per century are possible.<sup>77</sup>

Also of great concern is that the oceans are acidifying at an alarming rate. Ocean acidification is a predictable consequence of rising atmospheric CO<sub>2</sub>;<sup>78</sup> and the waters of the high-latitude Pacific-Arctic region are among the most vulnerable to ocean acidification because mixing and lower temperatures create conditions with lower pH and saturation state values.<sup>79</sup> A primary impact of ocean acidification is that it depletes seawater of the carbonate compounds—aragonite and calcite—that many marine creatures need to build shells and skeletons.<sup>80</sup> As a result, ocean acidification hinders organisms such as corals, crabs, seastars, sea urchins, and plankton from building the protective armor they need to survive. Rising acidity also affects the basic functions of fish, squid, invertebrates, and other marine species, including detrimental effects on metabolism, respiration,

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<sup>73</sup> Richter-Menge, J., et al., Arctic Report Card 2008, <http://www.arctic.noaa.gov/reportcard> (2008).

<sup>74</sup> IPCC, CLIMATE CHANGE 2007: SYNTHESIS REPORT, An Assessment of the Intergovernmental Panel on Climate Change, Available at [www.ipcc.ch](http://www.ipcc.ch) (2007).

<sup>75</sup> Hansen, J., et al., Global temperature change, 103 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA 14288-14293 (2006). Pritchard, H. D., et al., Extensive dynamic thinning on the margins of the Greenland and Antarctic ice sheets, NATURE doi:10.1038/nature08471 (2009).

<sup>76</sup> Rahmstorf, S., A semi-empirical approach to projecting future sea-level rise, 315 SCIENCE 368-370 (2007). Pfeffer, W. T., J. T. Harper, and S. O'Neil, Kinematic constraints on glacier contributions to 21st-century sea-level rise, 321 SCIENCE 1340-1343 (2008). Vermeer, M., and S. Rahmstorf, Global sea level linked to global temperature, 106 PROCEEDINGS OF THE NATIONAL ACADEMY OF SCIENCES OF THE UNITED STATES OF AMERICA 21527-21532 (2009). Grinsted, A., J. C. Moore, and S. Jevrejeva, Reconstructing sea level from paleo and projected temperatures 200 to 2100 AD, 34 CLIMATE DYNAMICS 461-472 (2010). Jevrejeva, S., J. C. Moore, and A. Grinsted, How will sea level respond to changes in natural and anthropogenic forcing by 2100, GEOPHYSICAL RESEARCH LETTERS 37:L07703, doi:07710.01029/02010GL042947 (2010).

<sup>77</sup> Milne, G. A., et al., Identifying the causes of sea-level change, NATURE GEOSCIENCE 2 (2009).

<sup>78</sup> Feely, R. A., S. C. Doney, and S. R. Cooley, Ocean acidification: present conditions and future changes in a high-CO<sub>2</sub> world, 22 OCEANOGRAPHY 36-47 (2009).

<sup>79</sup> Fabry, V.J., et al., Ocean acidification at high latitudes: the bellweather, 22 OCEANOGRAPHY 160-171 (2009). Mathis, J.T., The Extent and Controls on Ocean Acidification in the Western Arctic Ocean and Adjacent Continental Shelf Seas [in ARCTIC REPORT CARD 2011], <http://www.arctic.noaa.gov/reportcard> (2011).

<sup>80</sup> Orr, J.C., et al., Anthropogenic ocean acidification over the twenty-first century and its impact on calcifying organisms, 437 NATURE 681-686 (2005). Fabry, V., et al., Impacts of ocean acidification on marine fauna and ecosystem processes, 65 ICES JOURNAL OF MARINE SCIENCE, 414-32 (2008). Feely, R. A., S. C. Doney, and S. R. Cooley, Ocean acidification: present conditions and future changes in a high-CO<sub>2</sub> world, 22 OCEANOGRAPHY 36-47 (2009).

and photosynthesis, which can thwart their growth and lead to higher mortality.<sup>81</sup> Because of its serious impacts on so many species, ocean acidification threatens to disrupt the entire marine food web.

The impacts from climate change and acidification are not speculative or in the distant future; they are happening now. Virtually no species in Izembek Refuge will be unaffected over the coming decades. Below are examples of three important species of Izembek Refuge – black brant, Steller’s eiders, and caribou – that will be cumulatively impacted by climate change under some of the alternatives being considered in the DEIS.

**a. Black Brant**

The DEIS acknowledges that climate change is occurring due to greenhouse gas emissions, but it fails to analyze the effects of the alternatives on black brant in the context of a changing and stressed environment. The DEIS’s cumulative analysis is incomplete and inaccurate and makes no mention of climate change impacts to black brant distribution and reproductive success, nor how increased human disturbance may further amplify the negative impacts of climate change on black brant.

Climate change over the last 50 years has impacted wetland habitats in North America, which has in turn impacted black brant. Effects include changes in distribution, survival and fitness, and breeding propensity.<sup>82</sup> Current global warming projections indicate that the rate of change is likely to accelerate, which will further impact black brant.<sup>83</sup> Black brant nest on coastal tundra throughout the Arctic, and typically spend the winter months in bays along the Pacific Coast of Mexico, although they may overwinter anywhere along the Pacific Coast from Alaska to Mexico.<sup>84</sup> Black brant depend heavily on a species of eelgrass, *Zostera marina*, as a primary food source.<sup>85</sup> Nearly the entire Pacific population of black brant concentrates in a single area at Izembek Lagoon during the fall migration, prior to its more than 2,000-mile flight to winter habitat.<sup>86</sup> Currently, black brant are experiencing a distribution shift throughout their migratory flyway that is likely related to climate change influences on the abundance and availability of their primary food source, the eelgrass *Z. marina*.<sup>87</sup>

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<sup>81</sup> Fabry, V., et al., Impacts of ocean acidification on marine fauna and ecosystem processes, 65 ICES JOURNAL OF MARINE SCIENCE, 414-32 (2008).

<sup>82</sup> Ward, D.H., et al., North American brant: effects of changes in habitat and climate on population dynamics, 11 GLOBAL CHANGE BIOLOGY 869-880 (2005).

<sup>83</sup> IPCC, CLIMATE CHANGE 2007: SYNTHESIS REPORT, An Assessment of the Intergovernmental Panel on Climate Change, Available at [www.ipcc.ch](http://www.ipcc.ch) (2007).

<sup>84</sup> Ward, D.H., et al., North American brant: effects of changes in habitat and climate on population dynamics, 11 GLOBAL CHANGE BIOLOGY 869-880 (2005). Sedinger, J.S., et al., Carryover effects associated with winter location affect fitness, social status, and population dynamics in a long-distance migrant, AMERICAN NATURALIST, accessed on April 24, 2012 at <http://www.asnamnat.org/node/157?page=1> (2011).

<sup>85</sup> Ward, D.H., et al., North American brant: effects of changes in habitat and climate on population dynamics, 11 GLOBAL CHANGE BIOLOGY 869-880 (2005).

<sup>86</sup> Id.

<sup>87</sup> Ward, D. H., et al., Change in abundance of Pacific brant wintering in Alaska: evidence of climate warming effect? 62 ARCTIC 301-311 (2009).

Increased populations of wintering black brant in the northern end of their flyway is already evident in Alaska.<sup>88</sup> Over the past 15 years, Alaska populations of wintering black brant have increased, while populations of black brant overwintering in Mexico have decreased, especially at the southernmost sites.<sup>89</sup> This increase in the number of brant wintering in Alaska coincides with a warming trend in the North Pacific that reduces the period and frequency of ice cover in coastal areas along the Alaska Peninsula.<sup>90</sup> This increases the food availability and reduces the energy costs for wintering black brant. Effects were exacerbated during historic El Niño events, which resulted in increased sea temperatures and a rise in sea level, simulating the impacts of impending climate change. El Niño events caused a dramatic decline (up to 50 percent) of *Z. marina* abundance at the black brant's southern wintering sites, limiting food availability at these sites, and pushing wintering brant northward.<sup>91</sup> Thus, climate change reduces food availability for brant wintering at the most southern sites, while increasing foraging ability and food availability for brant wintering at more northern sites. This northern shift will likely result in an increased number of black brant wintering at Izembek Refuge.

An increase in the number of wintering black brant at Izembek Refuge means that more of the population will be put at risk should mild winters be punctuated by extended periods of severe cold weather and extreme shorefast ice cover, as occurred in winter of 1991-92.<sup>92</sup> Extreme storm events and highly fluctuating winter temperature scenarios are likely to become more frequent as climate change leads to greater climate variability and a rise of extreme weather events.<sup>93</sup> Any threats to the Alaska wintering population have implications for the entire Pacific Flyway population of black brant. It is important to limit adverse impacts from human development and disturbance, because this species is experiencing a long-term population decline across its range.<sup>94</sup>

Human activity can also lead to shifts in black brant distribution and seasonal use patterns, adding to the impacts of climate change on distribution and population. Brant are extremely sensitive to many forms of human disturbance and may have abandoned former wintering grounds in California and Oregon in favor of Mexico due to this factor.<sup>95</sup> This sensitivity to human disturbance is especially relevant when discussing impacts on black brant from the DEIS's road alternatives (Alternative 2

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<sup>88</sup> Pacific Flyway Council, PACIFIC FLYWAY MANAGEMENT PLAN FOR PACIFIC BRANT, Pacific Flyway Study Committee, U.S. Fish and Wildlife Service, Portland, OR (2002). Sedinger, J.S., et al., Carryover effects associated with winter location affect fitness, social status, and population dynamics in a long-distance migrant, AMERICAN NATURALIST, Accessed on April 24, 2012 at <http://www.asnamnat.org/node/157?page=1> (2011).

<sup>89</sup> Ward, D. H., et al., Change in abundance of Pacific brant wintering in Alaska: evidence of climate warming effect? 62 ARCTIC 301-311 (2009). Sedinger, J.S., et al., Carryover effects associated with winter location affect fitness, social status, and population dynamics in a long-distance migrant, AMERICAN NATURALIST, Accessed on April 24, 2012 at <http://www.asnamnat.org/node/157?page=1> (2011).

<sup>90</sup> Ward, D.H., et al., North American brant: effects of changes in habitat and climate on population dynamics, 11 GLOBAL CHANGE BIOLOGY 869-880 (2005).

<sup>91</sup> Id.

<sup>92</sup> Ward, D. H., et al., Change in abundance of Pacific brant wintering in Alaska: evidence of climate warming effect? 62 ARCTIC 301-311 (2009).

<sup>93</sup> IPCC, CLIMATE CHANGE 2007: SYNTHESIS REPORT, An Assessment of the Intergovernmental Panel on Climate Change, Available at [www.ipcc.ch](http://www.ipcc.ch) (2007).

<sup>94</sup> Ward, D. H., et al., Change in abundance of Pacific brant wintering in Alaska: evidence of climate warming effect? 62 ARCTIC 301-311 (2009).

<sup>95</sup> Miller, M.W., Route selection to minimize helicopter disturbance of molting Pacific black brant: A simulation, 47 ARCTIC 341-349 (1994).

and 3). Human disturbance of migratory waterfowl may reduce food intake through interruption of foraging bouts or displacement from feeding areas, and may increase energy expenditure from avoidance or flight-related activities.<sup>96</sup> Increased activity in response to disturbance may restrict the ability of waterfowl to acquire sufficient nutrition for successful migration and influence winter survival.<sup>97</sup> For example, oyster farming activities at an important spring staging area for black brant in Washington were correlated with reductions in *Z. marina* abundance and a corresponding significant decrease in brant use-days of that area.<sup>98</sup>

Many studies have demonstrated that animals will avoid areas where human-associated disturbances are present, rather than experience the increased stress and associated decline in fitness that results from responding to disturbance. Animals respond to human disturbance with energetically costly behaviors, such as flight and increased alert behavior, which divert time and energy away from other important activities including feeding, parental care, or mating displays.<sup>99</sup>

Over 90 percent of black brant annually migrate to Izembek Lagoon in the fall, making this area critical to migration and overwintering success of black brant. The increased human access afforded by either road alternative to areas of high use by black brant, especially during hunting season, would significantly increase disturbance levels in areas where such access did not previously exist. This would reduce the refugia area that black brant previously used at low or non-existent disturbance levels. Increased direct mortality due to improved access for hunting, avoidance of key habitat, or decreased energy uptake prior to migration due to disturbance could result in significant adverse impacts to the black brant population.

Human disturbance must be kept to a minimum at Izembek Lagoon, but Alternative 2 or 3 would increase human disturbance and habitat degradation. The dependence of black brant on *Z. marina* and the intertidal habitat of Izembek Lagoon leave this species vulnerable to human activities with impacts further compounded by the effects of climate change on food sources and habitat use.<sup>100</sup> Climate change may cause declines in winter food availability by shifting the distribution and integrity of *Z. marina* and other intertidal plants at black brant wintering and migratory stopover sites, including Izembek. With warming temperatures, more black brant are likely to winter at Izembek, as brant wintering at southern sites suffer decreased reproductive success.<sup>101</sup> This leaves the brant populations at Izembek especially vulnerable, and human disturbance at this site will have an increasingly more significant impact in the future as the black brant population continues to shift north. Conditions at any site used by brant along the flyway may impact fitness and survival of individual brant.

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<sup>96</sup> Ward, D.H., R.A. Stehn, and D.V. Derksen, Response of staging brant to disturbance at the Izembek Lagoon, Alaska, 22 WILDLIFE SOCIETY BULLETIN 220-228 (1994).

<sup>97</sup> Id.

<sup>98</sup> Wilson, U.W. and J.R. Atkinson, Black brant and spring-staging use at two Washington coastal areas in relation to eelgrass abundance, 97 CONDOR 91-98 (1995).

<sup>99</sup> Frid, A. and L. Dill, Human-caused disturbance as a form of predation risk, 6 CONSERVATION ECOLOGY 11 (2002).

<sup>100</sup> Sedinger, J.S., et al., Carryover effects associated with winter location affect fitness, social status, and population dynamics in a long-distance migrant, AMERICAN NATURALIST, Accessed on April 24, 2012 at <http://www.asnamnat.org/node/157?page=1> (2011).

<sup>101</sup> Ward, D. H., et al., Change in abundance of Pacific brant wintering in Alaska: evidence of climate warming effect? 62 ARCTIC 301-311 (2009).

The Service must consider the impacts of the road and land exchange options (Alternatives 2 and 3) on black brant in the context of climate change. Human disturbance, degradation of habitat, and a resulting decreased nutritional intake by black brant using Izembek would have major cumulative impacts on the entire black brant population.

***b. Steller's Eider***

The DEIS fails to analyze the cumulative impacts on Steller's eiders of the action alternatives in the context of climate change. There is no mention of climate change impact in the environmental effects section, despite the vulnerability of this species to climate change impacts. The Service must take these cumulative impacts into account when deciding among the proposed alternatives.

Steller's eiders are particularly vulnerable in the warming Arctic and sub-Arctic. Warming temperatures and acidifying waters in the Bering Sea threaten the eider's food supply, while at the same time forcing eiders to expend more energy in their search for food and reducing the amount of sea ice available for resting.

The loss of the sea ice in the northern Bering Sea is reducing the abundance of the eider's bottom-dwelling invertebrate prey.<sup>102</sup> As competitors, such as fish and crabs, move northward with warming ocean temperatures, they invade the eider's foraging grounds and consume its food sources. Acidifying waters are making it more difficult for clams and snails to build their calcium carbonate shells, limiting abundance of these species and further reducing availability of the eider's food sources. The disappearance of sea ice may deprive eiders of dry places to rest, causing them to burn more energy.<sup>103</sup> Climate change also threatens the eider's nesting grounds on the coastal tundra of Alaska and Siberia. Eiders nest in the tundra wetlands near shallow ponds and lakes that provide plentiful insect and plant food. However, rising temperatures are melting the permafrost, which threatens to dry up the eider's nesting grounds and transform the tundra into shrublands and forests.

The majority of the world population of Steller's eider molts along the north side of the Alaska Peninsula, primarily at Nelson and Izembek lagoons during September and October.<sup>104</sup> Following the molt, some eiders move to wintering areas along the south side of the Alaska Peninsula and the easternmost Aleutian Islands, while many remain in the Izembek Lagoon where they molted.<sup>105</sup> These coastal wintering populations of Steller's eiders will be impacted by climate change, as Alaskan coasts are heavily battered by erosion, which is wearing away the eider's coastal habitat and inundating it with saltwater.

Climate change-induced shifts in productivity and food availability at Izembek may substantially decrease available nutrients in the area. Nearly half the population of Steller's eiders is found in Izembek during the molt, at which time the eiders are flightless and have higher energy demands.

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<sup>102</sup> Grebmeier, J. M., et al., A major ecosystem shift in the Northern Bering Sea, 311 SCIENCE 1461-1464 (2006).

<sup>103</sup> Lovvorn, J. R., et al., Modeling marine protected areas for threatened eiders in a climatically changing Bering Sea, 19 ECOLOGICAL APPLICATIONS 1596-1613 (2009).

<sup>104</sup> Petersen, M.R., Populations, feeding ecology and molt of Steller's Eiders, 83 CONDOR 256-262 (1981).  
Dau, C. P., P. L. Flint and M.R. Petersen, Distribution of recoveries of Steller's eiders banded on the lower Alaska peninsula, Alaska, 71 JOURNAL OF FIELD ORNITHOLOGY 541-548 (2000).

<sup>105</sup> Pacific Flyway Council, PACIFIC FLYWAY MANAGEMENT PLAN FOR PACIFIC BRANT, Pacific Flyway Study Committee, U.S. Fish and Wildlife Service, Portland, OR (2002).

The molt lasts approximately three weeks. Molting and wintering eiders consume marine invertebrates that occur in the extensive eelgrass beds within Izembek Lagoon channels. Ocean acidification caused by greenhouse gas emissions may reduce the availability of the eider's food source, due to shifts in marine productivity and a decreased ability of invertebrates to form calcium carbonate shells.<sup>106</sup> Sea-level rise due to climate change may eliminate or reduce eelgrass beds, which would further reduce the availability of the small invertebrates that serve as the eider's primary food source. Nutrition obtained during the molt may be vital to long-term energy reserves, and reduced energy intake would impact survival and reproductive success of the Steller's eider.<sup>107</sup> Other studies have found that a decline in availability of preferred foods at wintering locations may have played a role in extinction of other migrating bird species.<sup>108</sup>

Steller's eiders are sensitive to human disturbance.<sup>109</sup> The direct effects of unreported subsistence take and indirect disturbances from a road, as proposed in Alternatives 2 and 3, would increase mortality, place further energetic demands on the eiders, or displace them from preferred foraging habitat. This could force Steller's eiders at Izembek into a negative energy state. Because nearly half of the Alaska population uses Izembek as a molting ground, population-level effects on the Steller's eider due to the cumulative impacts of Alternatives 2 or 3 and climate change could be significant.

In the Final EIS, the Service must include analyses of habitat disturbance and degradation due to the road alternatives (Alternatives 2 and 3) in the context of habitat degradation and decreased nutritional availability caused by climate change. Road construction and use along with climate change would have significant long-term synergistic impacts on the future viability of this threatened species.

### *c. Caribou*

The DEIS's current analysis for caribou completely fails to consider climate change. Caribou are vulnerable to climate change in numerous ways, and impacts have already been observed.<sup>110</sup> The Final EIS must include an analysis of the cumulative impacts of the action alternatives on this species in the context of climate change.

Caribou time their annual migrations to arrive in an area for calving at spring green-up, when vegetation is at its nutritional peak.<sup>111</sup> This is when nutritional demands for nursing mothers are highest, and it is a critical time for successful reproduction. Warming temperatures are causing an earlier spring growing season, but caribou are not changing the timing of migration and calving to

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<sup>106</sup> Orr, J.C., et al., Anthropogenic ocean acidification over the twenty-first century and its impact on calcifying organisms, 437 NATURE 681-686 (2005).

<sup>107</sup> Kertell, K., Disappearance of the Steller's eider from the Yukon-Kosokwim Delta, Alaska, 44 ARCTIC 177-187 (1991).

<sup>108</sup> Lovvorn, J. R., et al., Modeling marine protected areas for threatened eiders in a climatically changing Bering Sea, 19 ECOLOGICAL APPLICATIONS 1596-1613 (2009).

<sup>109</sup> Kertell, K., Disappearance of the Steller's eider from the Yukon-Kosokwim Delta, Alaska, 44 ARCTIC 177-187 (1991).

<sup>110</sup> Vors, L. S., and M. S. Boyce, Global declines of caribou and reindeer, 15 GLOBAL CHANGE BIOLOGY 2626-2633 (2009).

<sup>111</sup> Post, E., and M. C. Forchhammer, Climate change reduces reproductive success of an Arctic herbivore through trophic mismatch, 363 PHILOSOPHICAL TRANSACTIONS OF THE ROYAL SOCIETY B-BIOLOGICAL SCIENCES 2369-2375 (2008).

keep pace with this change. This causes the timing between caribou presence in an area and prime plant growth to be non-synchronous. Because of this timing mismatch and resulting lower food availability, more calves are dying and offspring numbers have dropped fourfold in at least one population.<sup>112</sup> Insect harassment has also increased as biting flies and mosquitoes are emerging earlier and increasing in abundance and activity as temperatures warm. These insects severely harass caribou, limiting their time spent feeding and increasing stress-related behaviors. Severe insect harassment can lead to decreased pregnancy rates and increased winter mortality.<sup>113</sup> Caribou are also impacted by severe winter weather, which is increasing in frequency and intensity due to climate change. Freezing rain and ice crusts can lock lichen, caribou's required food, under a layer of impenetrable ice. Deeper snow makes it more difficult for caribou to find lichen, forces caribou to burn more energy for travel, and increases vulnerability to predators.<sup>114</sup>

Caribou are sensitive to human disturbance, and their movements would be interrupted by the road and road barriers. The DEIS's current analysis for Alternatives 2 and 3 discusses impacts from the road, including human disturbance and limitations to caribou movements across the isthmus, but it makes no mention of climate change. The DEIS states that "even lightly used roads are barriers to caribou movements" and "if the herd did not cross the isthmus to reach their normal wintering/calving areas, it would have a high intensity, long-term, adverse effect on caribou in the whole region."<sup>115</sup> However, the cumulative impact analysis completely fails to consider how climate change might increase the vulnerability of these caribou.

Climate change may have significant impacts on the energy demands, survival, and reproduction of the Southern Alaska Peninsula caribou herd. As noted above, climate change-induced impacts to caribou include timing mismatches between migration and parturition and spring green-up, insect harassment, and increased storm and ice events. These impacts lead to decreased body condition, increased stress levels, and reduced individual survival and reproduction. This could have a multitude of effects on caribou at the individual and population level, which would be exacerbated by human disturbance resulting from the use of a road. Lower energy intake and reduced ability to travel may cause caribou to spend more time on the plowed road or limit their ability to travel through energetically demanding conditions, including roadside drifts. Increased stress due to summer insect activity may alter habitat use, possibly causing caribou to spend more time near the road corridor. This increases the caribou's susceptibility to human and animal predation. Caribou are sensitive to human presence and view humans as a predation risk.<sup>116</sup> Although the Southern Alaska Peninsula caribou herd is currently closed to sport and subsistence hunting, any increase in human presence originating from either of the proposed road alternatives would elicit a powerful avoidance response in caribou and would likely result in significant displacement from preferred winter habitat in the isthmus area. Caribou already stressed by climate change may suffer increased mortality due to increased energetic demands and decreased feeding when reacting to and running from human disturbance. This type of direct human disturbance would increase with road access into their range.

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<sup>112</sup> Id.

<sup>113</sup> Vors, L. S., and M. S. Boyce, Global declines of caribou and reindeer, 15 *GLOBAL CHANGE BIOLOGY* 2626-2633 (2009).

<sup>114</sup> Id.

<sup>115</sup> DEIS at 4-154 and 4-155.

<sup>116</sup> Frid, A. and L. Dill, Human-caused disturbance as a form of predation risk, 6 *CONSERVATION ECOLOGY* 11 (2002).

#### ***d. Other Species***

As the Izembek Refuge ecosystem on which Pacific black brant, Steller's eiders, and caribou depend undergoes drastic climatic changes, these species' survival and adaptive capacity may depend on maximizing the availability of undisturbed habitat. However, these are only a few examples of species in Izembek Refuge that will be impacted by climate change. The Service must analyze the effects of the various alternatives in the context of climate change for the full range of species that rely on Izembek Refuge.

#### **F. The Final EIS Must Fully Consider Pertinent Legislation**

In 1998, Congress specifically prohibited a road in this unique landscape. Working with Alaska's Senator Ted Stevens, Congress passed the King Cove Health and Safety Act giving the community \$37.5 million to fund a transportation alternative and make improvements to the local medical facilities. The King Cove Act is central to the history of the actions under consideration in this DEIS, and it is essential for the public to understand this important matter, yet the DEIS's summary of pertinent "Federal Laws, Regulations, and Policies" fails to include this law.<sup>117</sup> Furthermore, the presentation given at the beginning of the May 3, 2012, public hearing in Anchorage, Alaska also failed to mention the King Cove Health and Safety Act. We believe this represents a serious omission that has significant implications for assessing the adequacy of the DEIS and associated public process.

With respect to the Wilderness Act, the DEIS fails to discuss the unacceptable precedent that the proposed land exchange would set if approved.<sup>118</sup> The DEIS uses the four qualities of wilderness character that are more tangible and more easily measured but fails to acknowledge that there is a suite of intangible qualities that are also associated with wilderness character.<sup>119</sup> The Final EIS should include a complete presentation of how the proposed land trade and road would affect these intangible values and set a precedent. The DEIS incorrectly claims that "[a]ctions that intentionally manipulate or control ecological systems inside wilderness degrade the untrammelled quality of wilderness character..."<sup>120</sup> The Wilderness Act does not invoke "intentionality" into the untrammelled concept. Any action that manipulates or controls ecological systems inside Wilderness, intentional or unintentional, degrades the untrammelled quality. The DEIS should correctly represent this important distinction.

#### **G. The Final EIS Must Provide an Accurate and Thorough Assessment of Costs and Benefits**

The DEIS fails to present a benefit-cost analyses (BCA) of the proposed alternatives which is how federal agencies establish whether or not a project generates net public benefits from a social perspective. At the request of The Wilderness Society, The Center for Sustainable Economy completed a BCA for alternatives 2 and 3 which suggests that the costs of a road would be 7-13 times greater than the benefits. This analysis was submitted by The Wilderness Society and The Center for Sustainable Economy and is incorporated here by reference in its entirety.

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<sup>117</sup> DEIS at 1-11 to 1-18.

<sup>118</sup> DEIS at 3-342 to 3-350.

<sup>119</sup> DEIS at 3-344 to 3-347.

<sup>120</sup> DEIS at 3-345.

## H. The Final EIS Must Incorporate New Information on Hovercraft Operational Capabilities

AEB suspended hovercraft service in 2010, citing high costs and weather-related operational problems. In the attached letter to the U. S. Army Corps of Engineers dated February 24, 2012, AEB Mayor Stanley Mack stated, “We believe that we have saved lives using the hovercraft during medical emergencies, but at great costs and with limited success in our regular, non-emergency hovercraft operation.” While this statement demonstrates the hovercraft’s success in meeting King Cove’s health and safety needs, it ignores the fact that the \$37.5 million appropriation that allowed for its purchase was never intended to address all of AEB non-emergency transportation problems.

AEB’s actions in recent months to begin using the hovercraft for an unrelated purpose in one of its other villages contradict its previous assertions that the hovercraft is cost-prohibitive and unreliable, and even the claim that the hovercraft was unable to address regular non-emergency operational needs. A KUCB article from March 2012 quotes AEB Administrator Sharon Boyette as stating that “the borough is planning to move the hovercraft down to Akutan for use at the airport that’s scheduled to open in that community this summer.”<sup>121</sup> The attached Administrator’s Report from Ms. Boyette dated December 5, 2011, also references these plans:

And speaking of the hovercraft which now sits in Cold Bay on the hovercraft pad. . . . We have developed a plan for the repair, installation of modifications and redeployment of the Suna-X in Akutan. The date by which we are expected to have the craft and crew ready for the first airport passenger run is September 1, 2012.

While AEB has asserted that it cannot afford to operate the hovercraft between King Cove and Cold Bay, as stated in the attached memo from Sharon Boyette dated March 19, 2012, “AEB is committed in writing to running and paying for the marine link between Akutan village and Akun airport for the next twenty years.” AEB has also cited that operational difficulties in winter weather led to its decision to suspend hovercraft service in 2010. However, the attached Administrator’s Report dated March 14, 2012, reveals that this problem is being addressed:

Work on the Akutan hovercraft has begun in Cold Bay. Mechanics are working to de-winterize the vessel and also to make repairs and renovations. We are trying to provide additional reliability by adding a de-icing package and we will make improvements to the bow ramp system.

In fact, AEB is confident enough with the hovercraft’s new de-icing capabilities to propose that it be used to make 1-2 trips per day, 7 days per week between nearby Akutan and Akun, as noted in the attached Draft Akutan-Akun Ferry Service Plan.

While transferring the hovercraft to Akutan at this time would be in violation of federal regulations governing the use of equipment purchased through agency grant agreements, the vessel is clearly better able to operate between King Cove and Cold Bay than ever before. The Final EIS should include updated information referencing the hovercraft’s new de-icing equipment, as well as AEB’s capacity to cover the cost of operating it.

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<sup>121</sup> Stephanie Joyce, King Cove counting on Izembek Road EIS approval, KUCB (March 29, 2012).

## **I. The Final EIS Should Include Reference to AEB's Landing Craft/Passenger Ferry Option**

The attached letter from AEB Mayor Stanley Mack to the U.S. Army Corps of Engineers dated February 24, 2012, indicates AEB's intention to operate an aluminum landing craft passenger ferry between the existing northern hovercraft terminal and Cold Bay in the event that the land exchange and road are not approved. AEB indicated that it would fund the construction and operation of a vessel designed to accommodate 30 passengers, an ambulance, and cargo. This letter reveals that AEB has developed an economically viable alternative to the proposed road. The plan would not require a land exchange and would be far less costly and destructive to the environment than building and maintaining a road that would be extremely difficult to keep open and traverse in severe winter conditions. In addition, the AEB plan would be self-funded and eliminate the additional expenditure of 20-30 million federal taxpayer dollars. Furthermore, this AEB plan could be entirely compatible with the Service's decision to choose the No Action alternative and a finding by the Secretary of Interior that the proposed road and land exchange are not in the public interest. The Final EIS should acknowledge AEB's plan to pursue this option under such circumstances.

## **J. The Final EIS Should Consider How Well Congress' \$37.5 Million Solution Was Implemented**

The Stevens' rider and other subsequent actions related to the management of the hovercraft raise questions about how efficiently and effectively the congressional solution provided has been applied. In spite of its medical needs having been met, AEB terminated the hovercraft operation in 2010, claiming it was too costly to operate and unreliable. We are unaware of any steps taken to create a revenue plan for the hovercraft; instead, the success of the hovercraft in meeting every medical emergency has been downplayed or ignored. As early as March 2008, the AEB website posted an article that reported consideration of "selling two hovercraft engines in storage, which would bring in \$150,000 - \$200,000." AEB subsequently sold both engines at a large loss. A public interest determination should be based on a thorough accounting of how \$37.5 million in taxpayer funds were applied to meet the agreement negotiated by Senator Stevens and accepted by King Cove.

A review should include an examination of whether or not the hovercraft has been targeted for failure from the beginning, and the reason why there is no money for the operation of the hovercraft. According to a 2008 article in the *Washington Post*, the community "hired high-powered advocates to help them [build the road], dipping into a \$2.4 million budget over the past two years to spend \$145,000 on lobbying in Washington and another \$136,000 more to fly officials there to push the issue...[t]he borough spent an additional \$72,000 during that period for lobbying in the state capital."<sup>122</sup> The investigation should look into the sales of spare engines and transfer of the hovercraft to Akutan. Background information on the King Cove Health and Safety Act and the handling of the hovercraft should be included in the Final DEIS.

During the scoping meeting at Sand Point, Alaska, the point of not needing the road for health and safety purposes was captured in the Service transcript, which reported: "Gary Hennigh – after power point presentation – he stated that the King Cove people do not see the proposed road as a primary means of health and safety – the road would be a matter of allowing the King Cove people a

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<sup>122</sup> Matthew Mosk and Marc Kaufman, Proposed road in refuge raises fears about drilling, *The Washington Post* (November 9, 2008).

better quality of life.”<sup>123</sup> Such comments indicate that the proposed road is for other purposes, such as personal travel, easier access to the Izembek Wilderness, and commercial interests related to transportation of fish.

The contention that the purpose of the land exchange is to address “health and safety issues, including reliable access to and from the Cold Bay Airport, and only for non-commercial purposes,”<sup>124</sup> is further refuted by the list of economic groups that travel between King Cove and Cold Bay, including 1) Peter Pan Seafoods fish processing crews, 2) managers and technicians for Peter Pan Seafoods, 3) fishing crew members and other persons not associated with fisheries, and 4) residents and other persons not associated with fisheries.<sup>125</sup> The majority of planned users of the road are fishery-related passengers.<sup>126</sup> The true purpose of the proposed road appears to be the transportation of fish industry employees and commercial fish products rather than health and safety.

The assumption that a Peter Pan sport utility vehicle would not use the road, as stated in the DEIS,<sup>127</sup> is impracticable. If Peter Pan is willing to load an SUV on a hovercraft or ferry, it is reasonable to assume that the company would use it on the road for transportation of managers, invited guests, contractors, workers, etc. As the largest seafood processor in Alaska, Peter Pan has relatively high reported revenues, and it is unlikely that the cost of driving an SUV or other commercial vehicles would serve as a deterrent. Thus, the costs of ground travel for this vehicle should be included in the analysis of these costs.

The hovercraft has successfully operated out of Lenard Harbor and could continue to do so in the future should weather or road conditions dictate. Thus, Table 4.2.3-6 and analyses of these costs should consider hovercraft operation at Lenard Harbor under Alternatives 1 and 4. The costs of road maintenance equipment also appear to be underestimated, not accounting for the likely need for additional equipment, the lifespan and costs associated for acquisition, maintenance, and replacement. We recommend that the cost estimates for Alternatives 2 and 3 be modified to reflect these costs.

### **III. THE NO ACTION ALTERNATIVE IS THE BEST APPROACH TO AVOIDING MORE BROKEN PROMISES**

The AEB’s land exchange and road proposal is one of several recent attempts to allow development within Alaska’s national wildlife refuges. The St. Matthew Island land exchange would have transferred lands owned by Native corporations within the former Clarence Rhode National Wildlife Refuge (now the Yukon Delta National Wildlife Refuge) that were already subject to Section 22(g) of ANCSA, in exchange for lands that are designated as Wilderness within the Alaska Maritime National Wildlife Refuge on St. Matthew Island. Cook Inlet and Calista Regional Corporations would have gained ownership of the St. Matthew Island lands where they planned to lease the lands for on shore facilities supporting oil exploration and development in the Bering Sea. This action

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<sup>123</sup> U.S. Fish and Wildlife Service, Transcript from public scoping meeting in Sand Point, available at [http://izembek.fws.gov/pdf/community\\_scoping\\_meeting\\_sand\\_point.pdf](http://izembek.fws.gov/pdf/community_scoping_meeting_sand_point.pdf) (April 26, 2010).

<sup>124</sup> DEIS at 1-5.

<sup>125</sup> DEIS at 4-64.

<sup>126</sup> DEIS at 4-68 (Table 4.2.3-7).

<sup>127</sup> DEIS at 4-65.

was ultimately nullified by a U.S. District Court ruling. Another land exchange scheme was developed, at significant taxpayer expense, to exchange lands on the coastal plain of the Arctic National Wildlife Refuge for various Native Corporation lands in or adjacent to several refuges. This effort was halted by the U.S. Congress. Yet another land exchange deal was finally dropped that would have facilitated oil and gas exploration and development and bifurcated the Yukon Flats National Wildlife Refuge. In each case, the value and quality of lands proposed for exchange were not properly evaluated and the potential impacts to the Refuge purposes and ecological integrity were far greater than any gains that might have occurred.<sup>128</sup>

The Omnibus Public Land Management Act of 2009 includes restrictions to prohibit commercial use of the proposed road,<sup>129</sup> but like other promised protections they could be overturned in the future. The Japanese-owned Peter Pan fish processing facility in King Cove is the largest in Alaska, and AEB has pursued a major marketing program to sell its Aleutia brand salmon in domestic and Asian markets. This would be greatly facilitated by the proposed road, notwithstanding the current provision in the law that prohibits commercial use of the proposed road. If the road is actually completed, one has only to recall the history of the North Slope Haul Road, which was originally built for the sole purpose of constructing and maintaining the Trans-Alaska Pipeline. Promises to restrict use of the Haul Road were made at that time. Ultimately, the State of Alaska opened what became the Dalton Highway to all types of travel and commercial development. Once built, AEB, fish processors, and others would likely lobby Congress tirelessly with high-paid consultants and lawyers to open the road to commercial activity. In fact, the attached State of Alaska Capital Project Summary FY 2013 Request for the King Cove to Cold Bay Corridor Road Extension states as a purpose of the road “improving the mobility of people and *goods*” (emphasis added).

Another potential lobby for overturning the road restrictions is those supporting oil and gas development in the region. Future natural gas exploration in the area will bring a need to haul heavy equipment and transport materials. Despite the 2011 cancellation of administrative lease sales in the area, it is important to consider the potential for oil companies that have previously secured drilling rights on state lands in the borough and that have a financial investment in the area to press for eliminating road restrictions.

#### IV. SUMMARY

Izembek Refuge is an essential part of America’s wild legacy protected generations ago by individuals with the foresight to know that this area has national and international conservation significance. The Izembek Refuge Wilderness and wildlife habitat are unique natural resources; it is one of the few remaining wild places in our country not lost to development. These natural resources are critically important to Alaska Native communities and other Alaskans who rely on subsistence activities for their livelihood. The DEIS notes that Alternatives 2 and 3 will have major adverse impacts to Izembek Wilderness. More specifically, it notes that the proposed exchange of federal, State of Alaska, and King Cove Corporation lands would result in the removal of Wilderness

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<sup>128</sup> U.S. General Accounting Office (GAO), Consideration of Proposed Alaska Land Exchanges Should be Discontinued, GAO Report RCED-88-179 (September 1988). GAO, Chandler Lake Land Exchange Not in the Government’s Best Interest, Report RCED-90-5 (October 1989). U.S. Fish and Wildlife Service, Record of Decision, Proposed Land Exchange Yukon Flats National Wildlife Refuge Environmental Impact Statement (April 2010).

<sup>129</sup> P.L. 111-11, Title VI, Subtitle E.

lands, “which would fragment the wilderness and impact natural quality, undeveloped quality, and opportunities for solitude.”<sup>130</sup> Given the rapid loss of wildlife habitat worldwide, climate change challenges, and other stressors on wildlife, it is increasingly urgent that the environmental protections bestowed on Izembek Refuge be maintained and the No Action Alternative adopted.

Proponents of the land exchange have argued that additional lands are a fair exchange for the loss of the lagoon complex and designated Wilderness areas, but the value of the Refuge is not measured by acreage alone. The boundary of the Refuge was established because it had the greatest ecological benefits for wildlife. The proposed land exchange and road building in Alternatives 2 and 3 are in direct opposition to the purposes of the Izembek Refuge and should be rejected in the Final EIS. Another reason for rejecting Alternatives 2 and 3 is that they run counter to the King Cove Health and Safety Act, in which Congress clearly states that “in no instance may any part of such road, dock, marine facilities or equipment enter or pass over any land within the congressionally designated Wilderness in the Izembek National Wildlife Refuge.”<sup>131</sup>

The proposed road is incompatible with the purposes of the Izembek Refuge and is not in the public interest. The Service should therefore recommend Alternative 1, the No Action Alternative, in the Final EIS. The No Action Alternative will maintain long-standing federal protections that were thoughtfully developed and adopted to benefit Izembek Refuge’s wildlife and their habitat, subsistence users, Wilderness, and future generations.

Sincerely,

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<sup>130</sup> DEIS at ES-22.

<sup>131</sup> Public Law 105-277 Sec. 353(a).

**American Rivers**

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1101 14th Street NW Suite 1400  
Washington, DC 20005

**Audubon Alaska**

Nils Warnock  
Executive Director  
441 West Fifth Avenue Ste. 300  
Anchorage, AK 99501

**Blue Goose Alliance**

Ronald Fowler  
President  
10 S. Circle Road  
Edgewood, NM 87015-6817

**Center for Biological Diversity**

Rebecca Noblin  
Alaska Director  
810 N St # 201  
Anchorage, AK 99501

**ConservAmerica**

David Jenkins  
Vice President for Government and Political Affairs  
11705 Sumacs Street  
Oakton, Virginia 22124

**Cook Inletkeeper**

Bob Shavelson  
Inletkeeper  
333 West 4th Avenue, Suite 306  
Anchorage, AK 99501

**Defenders of Wildlife**

Karla Dutton  
Alaska Program Director  
441 West 5th Avenue, Suite 302  
Anchorage, AK 99501

**Friends of Alaska National Wildlife Refuges**

David C. Raskin  
Advocacy Chair  
2440 E. Tudor Road, PMB 283  
Anchorage, AK 99507-1185

**League of Conservation Voters**

Tiernan Sittenfeld  
Senior Vice President, Government Relations  
1920 L Street, NW Suite 800  
Washington, DC 20036

**National Wildlife Refuge Association**

Evan Hirsche  
President  
5335 Wisconsin Avenue, NW #521  
Washington, DC 20015

**Natural Resources Defense Council**

Charles M. Clusen  
Director of the Alaska Project  
1152 15th Street NW, Suite 300  
Washington, DC 20005

**Northern Alaska Environmental Center**

Pamela Miller  
Arctic Program Director  
830 College Road  
Fairbanks, AK 99701

**Sierra Club**

Dan Ritzman  
Alaska Program Director  
180 Nickerson Street, Suite 202  
Seattle, WA 98109

**The Wilderness Society**

Nicole Whittington Evans  
Alaska Regional Director  
705 Christensen Drive  
Anchorage, AK 99501

**The Wildlife Society**

Paul Krausman, CWB  
President  
5410 Grosvenor Lane, Suite 200  
Bethesda, MD 20814-2144

**Western Lands Project**

Janine Blaeloch  
Director  
P.O. Box 95545  
Seattle, WA 98145-2545

**Wilderness Watch**

George Nickas  
Executive Director  
P.O. Box 9175  
Missoula, MT 59807

**Wildlands CPR**

Adam Rissen  
Policy Specialist  
P.O. Box 7516  
Missoula, MT 59807

**World Wildlife Fund**

Margaret Williams  
Arctic Program Director  
406 G St # 301  
Anchorage, AK 99501

## Attachments:

- Aleutians East Borough meeting minutes from March 13, 2008.
- Letter from AEB Mayor Stanley Mack to Army Corps of Engineers (February 24, 2012).
- Aleutians East Borough Administrator's Report from Sharon Boyette (December 5, 2011).
- Aleutians East Borough memo from Sharon Boyette (March 19, 2012).
- Aleutians East Borough Administrator's Report from Sharon Boyette (March 14, 2012).
- Draft Akutan-Akun Ferry Service Plan (April 13, 2012).
- King Cove to Cold Bay Corridor Road Extension, FY 2013 Request, Reference No. 49675, State of Alaska Capital Project Summary (March 8, 2012).

cc: Kim Elton, Director of Alaska Affairs, Department of the Interior  
Pat Pourchot, Special Assistant for Alaska Affairs, Department of the Interior  
Dan Ashe, Director, U.S. Fish and Wildlife Service  
Greg Siekaniec, Deputy Director for Policy, U.S. Fish and Wildlife Service  
Jim Kurth, Chief, National Wildlife Refuge System

Paul requested the Administrator review the hovercraft. The Administrator said no revised numbers into Fund 21, Cold Bay King Cove Road. \$162,000 is year to date revenue and still have about \$19,000 to collect in receivables on hovercraft. \$24,000 expenditure was not a supply item but a spare part for bow thruster and P&I insurance will reimburse. The next month you should see expenditures decreasing around \$60,000 since no new spare parts and no insurance for a couple of months. We also cancelled out the Anchorage office and harbor house office closing as much as we can in expenditures. Other revenue is money collected in form of fees and interest money.

ROLL CALL

Marvin-yes, Paul-yes, Tara-yes, Joe-yes, Ernie-yes, Ken-yes, Carol-yes. Advisory: Justine-yes. Passed.

CONSENT AGENDA

- Introduction Ordinance 08-04, Introduction Advisory Seats.

MOTION

Ken moved to adopt and second by Tara.

DISCUSSION

Paul said during the workshop we discussed the difference between Assembly and School Board advisory representation in that the School Board would have three advisory members and Assembly two advisories. The Administrator explained that the school board can adopt a different policy than what the Borough does. Paul added, for the record, that this is the first reading and he still has not come to a conclusion on this issue yet. Ernie stressed the importance of each community always having a seat at the table and believes it is important they remain at a seat at the table. Tara agrees with Ernie.

ROLL CALL

Carol-yes, Tara-yes, Paul-yes, Ken-yes, Joe-yes, Marvin-yes, Ernie-yes. Advisory: Justine-yes. Passed.

RESOLUTIONS

Resolution 08-14, Removing Funds from the Permanent Fund:

MOTION

Ernie moved to adopt and second by Tara.

DISCUSSION

Paul said during the workshop the Assembly discussed at length the \$644,000 the Borough has available. As to the distribution he supports the idea of half of money distributed equally between communities and other half distributed per capita.

Ken supports the value of having a good portion distributed to meet immediate needs of the communities as they see fit and a portion to go into a Capital Improvement Project (CIP) fund to allow it to grow to meet CIP needs in the future.

Mayor Mack recommended approving resolution to give the Borough authority to use the money and then debate the options discussed at workshop to disburse either shared equally, per capita, half and half, or CIP fund.

*Aleutians East Borough Minutes  
March 13, 2008*

ROLL CALL

Ernie-yes, Paul-yes, Tara-yes, Carol-yes, Marvin-yes, Joe-yes, Ken-yes. Advisory: Justine-yes. Passed.

FURTHER DISCUSSION

Ernie noted that a lot of different ideas came forth at workshop, but there are also immediate needs of some communities. Joe said that amount is not going to meet everyone's needs.

MOTION

Joe moved that we distribute equally between all communities. Second by Marvin.

AMENDMENT

Paul moved to amend the motion to split 50/50, 50% dispersed equally and 50% distributed per capita. Second by Ernie.

Marvin said at workshop he suggested the idea of 50/50 split with 50% of money going into the saving fund for CIP although supports splitting the full amount equally. Joe does not want to decide what the community wants to do with it. He said if distributed per capita basis the Assembly would then discuss communities population and does not want to get into that discussion. Depending on how it is determined might not be fair so will vote against it. Paul explained that he feels Akutan, King Cove, and Sand Point are almost equal in size and a per capita split would benefit Akutan. Tara does not support the amendment.

ROLL CALL ON AMENDMENT

Paul-yes, Joe-no, Tara-no, Carol-no, Ernie-yes, Marvin-no, Ken-no. Advisory: Justine-no. Failed.

Joe requested that the Borough begin creating a CIP fund to start helping the communities with the big dollar projects by supporting some of the big projects one at a time. Dividing a small amount is not that much so recommends creating a different fund to fix long term.

ROLL CALL ON MOTION

Ken-yes, Marvin-yes, Paul-yes, Tara-yes, Joe-yes, Ernie-yes, Carol-yes. Advisory: Justine-yes. Passed.

OLD BUSINESS

Hovercraft Operations:

The Administrator reported that one of the spare engines has been sold and shipped to Seattle. The second spare engine is at Pacific Diesel. They are willing to work with us to get that engine sold, which will allow us to recapitalize the program for a few months. The hovercraft will continue to stand down for the remainder of the month of March. The hovercraft crew will be reduced and on stand by 40 hours a week. Hovercraft pilot, Gary Mack, will be leaving for vacation soon. Hovercraft engineer, Paul "Toby" Tobin, will be back on March 22<sup>nd</sup> so there will be about one week the hovercraft will be unavailable for medevacs. He plans to contact John Wagner who has expertise in running vessels to see if he has suggestions to get some life in this project. There are big problems, we are taking some affirmative steps and will continue to take some affirmative steps.

Ernie requested we add the hovercraft's rescue of captain and crew from burning vessel onto the plaques that the Borough displays in offices acknowledging rescues. Mayor Mack thanked Captain Gary Mack for going out and conducting the rescue and said that it does prove that the hovercraft is a life saving machine. He added that it is doing what it is suppose to do, but that it is financially draining until we can accomplish the road. May need to find a way to supplement the hovercraft until the road is accomplished. Captain Mack acknowledged the great job the rest of his crew also did during the rescue. Tara is concerned about not having medevac service for that week and supports talking with the crew so that there is no lapse in medevac service.

MOTION

Tara moved that the Borough support the operation of the hovercraft for emergency purposes only during the stand down, if possible. Second by Ernie.

Carol said we want the hovercraft for emergencies but if Gary Mack is going on vacation and Paul Schaack is not available does not know how we can make a motion when we don't have a crew available. Tara does not want to worry about staff issues but would like to make sure that it is available for medevacs.

ROLL CALL

Carol-yes, Tara-yes, Paul-yes, Ernie-yes, Ken-yes, Marvin-yes, Joe-yes, Advisory: Justine-yes. Passed.

King Cove Land Exchange:

Mayor Mack stated that he is feeling very optimistic about the land exchange possibility and have to just wait now. Paul asked the Administrator when we might expect a mark up on the bill. The Administrator said probably in April after Congress gets back to Washington D.C. on April 1.

Boys & Girls Club Funding Request:

The Mayor said the Borough donation policy says a donation has to benefit the entire AEB. This would benefit King Cove and Sand Point only. Both communities have stepped forward to financially help the Boys & Girls Club which has been a beneficial program in the communities. Ernie said the King Cove funding was moved to the summer program. The program in King Cove has been shut down and will be until the summer program. Della said initially Boys & Girls Club in King Cove, which is available for elementary age, had \$15,000 and the community has to come up with some of the funds. Mayor Mack said the tribes have also been helpful in funding.

MOTION TO TABLE

Ernie moved to table until next meeting and second by Carol. Hearing no objections motion passed.

The Clerk will include the last funding request letter from Boys & Girls Club in next packet.

NEW BUSINESS

Discussion of FY09 Budget Priorities:

The Administrator said time to think about whether we are going to have changes in staff and what to do with False Pass School. His intention in light is subsequent to memo is to

*Aleutians East Borough Minutes  
March 13, 2008*

create a lean budget to have money left over to appropriate next year. The Assembly has pointed out numerous comments on cost for people to live out here. COLA (cost of living adjustment) has increased 7.5% this year so could be an increase there.

Paul recommended keeping Sam Cotton on contract under the Resource Dept. Under Education he supports keeping False Pass School open. Oil & gas will mean perhaps a good future for the Borough, but he believes there is a fine line of reporting facts and selling it to people. He also believes the Borough should close our Juneau resource office.

Mayor Mack said he is trying to be as proactive as he can. A resolution was introduced for offshore oil & gas revenue sharing, although was not introduced early enough for action. Committee may take action on it telephonically. This would give the state some revenue to be distributed to the communities, which is long over due. Not sure where oil & gas development is going to go but optimistic enough to be ready for and is looking to be proactive ahead of time.

Carol said some staff salaries need to be looked at and some of the staff has not received a raise in a long time. She said in regards to the hovercraft believes we are right on track at this time. Boys & Girls Club is something we should assist with on the next budget and maybe the smaller communities can get something start also. She agrees that schools should remain open. Regarding the Juneau resource office does not support closing and also supports Sam Cotton being kept on contract. Carol said she has not paid much attention with oil & gas, but it is coming along real soon.

Marvin agrees with Carol on hovercraft, however, if land exchange goes through we are still looking at five years before the road is complete. Need to look for more revenue opportunities and look for subsidies. He is confident it can work. Juneau resource office is important to have. Regarding Boys & Girls Club he said anything for kids is important.

Justine agreed with Marvin. She also supports keeping the Juneau resource office. She supports being proactive on oil & gas development onshore and offshore. She supports moving forward in trying to get the land exchange and supports the hovercraft. She also supports Boys & Girls Club noting the importance of having things for children to do.

Ken also supports keeping Sam Cotton on contract. He supports keeping False Pass School open. He noted the oil & gas fisheries workshop next week and wants to make sure what ever happens is in our best advantage to our communities. Capital projects need to continue in our communities. Regarding the hovercraft, some sort of transportation is needed and hope we can make the land exchange happen. If it does not happen will still need a transportation link and some believe the hovercraft is workable. Ken supports Boys & Girls Club adding that the youth belong to the whole Borough and are our future.

Joe supports a CIP fund started out of permanent fund. He wants to continue discussing a port authority and he is still interested to see where the Borough will go with that.

Tara agrees with what others are saying. She supports keeping the school open. Regarding the hovercraft does not want to go back to not having an emergency way of getting medevacs over from King Cove. She supports keeping staff in their positions. She said it is essential to continue with onshore/offshore oil & gas development, she also supports funding Boys & Girls Club and supports continuing to look at a port authority.

Akun airport update: Joe said airport project is moving along quicker than boat harbor project. Need to find more funding saying that the airport has become much more critical because of the Grumman Goose landing gear problems occurring.

Senator Stevens website: Senator Stevens now has his earmarks listed on his website.

Cold Bay terminal: National Weather Service section should be completed in early May. FAA has \$500,000 to commit. Sharon talked to contractor and worked up change order for less than \$500,000. FAA has now requested a complete material list. Alaska Airlines also likes progress we have made. They have applied for the Essential Air Service in Adak.

#### PUBLIC COMMENTS

Theo Chesley asked if the Borough is still considering a mentoring program. The Administrator said he would like to see something like that happened but does not believe there is time to do that. He mentioned previous False Pass Advisory member, Jonathan Nelson, having left to continue his education is in a natural resource program back east and suggested to him how he might be able to do an energy project in the Borough. Maybe looking at how geothermal might work in one community. Mayor Mack said not much time now, but feels it is a good idea through out all the AEB offices to do some kind of program to encourage some young students to seek out higher education.

Gilda Shollikoff thanked the Assembly for supporting to keep the False Pass School open.

Della Trumble said the medevac piece is really important and the training is continually important. She fully understands the frustration and suggests getting the revenue loss down saying that the hovercraft will never be able to operate at a profit since our communities are so small.

Paul Schaack wanted to clarify with Assembly members he has been trying to get over to King Cove on Thursday and reminded them that he is just part time. If there are any younger generations that would like the opportunity, he would be willing to step down. The plans initially were to have the hovercraft building at the surveyed location at NE corner but we ended up at Leonards Harbor with tent building. That is just how it worked out and no one predicted it.

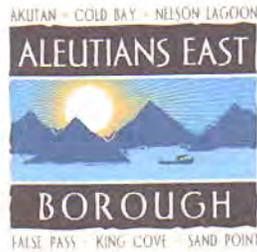
Eastern Aleutian Tribes Practitioner, Anne Perry, is finishing up 6 months in King Cove. She has sent half a dozen patients out on medevacs. She said it is real important to be able to get people out. There is a lot of room on the hovercraft allowing as many staff members as needed. The drive on a road might restrict them some feeling that you really can't put a price on the life of a person.

King Cove Fire Chief and EMT, Chris Babcock, takes his hat off to crew of hovercraft. He is one of the main people on medevacs and is an advocate for the road. He knows it is still a ways down the line and thanked the Borough for the hovercraft and glad the Borough is going to try to fund it.

#### ASSEMBLY COMMENTS

#### NEXT MEETING AND LOCATION

April 10 in Cold Bay.



February 24, 2012

Kevin Morgan  
Division Chief  
Alaska District; Regulatory Division  
US Army Corps of Engineers  
P.O. Box 6898 (CEPOA-RD)  
JBER , Alaska 99506-0898

Dear Mr. Morgan,

This letter will provide information to the Corps of Engineers (COE) about the recent announcement by the Aleutians East Borough (AEB) regarding its decision not to operate the hovercraft between the Northeast Corner and Cross Wind Cove or other Cold Bay location. As the COE is aware, the AEB has struggled to run a hovercraft between King Cove and Cold Bay. We believe that we have saved lives using the hovercraft during medical emergencies, but at great costs and with limited success in our regular, non-emergency hovercraft operations. These hovercraft operations have resulted in annual losses of over \$1 million, which have been borne by all AEB residents.

Although we had hoped to reduce costs and increase revenues using the new hovercraft terminal at the Northeast Corner of Cold Bay, our cost projections still do not justify re-starting hovercraft operations. Based on anticipated high net costs -- still near the \$1.0 million mark annually -- with only slightly better performance, the AEB reached its decision not to operate the hovercraft between the Northeast Corner and Cold Bay in the future.

The Alaska Department of Transportation & Public Facilities has entered into a binding contract to complete all the elements of the current road project (i.e. King Cove Access Project) to the Northeast Corner as authorized in the King Cove Health & and Safety Act. This project is COE Permit number #2-2000-0300; Cold Bay 12. The permitted construction activities will be completed as required under the Permit with completion planned by the end of the 2012 field season. We believe that our decision regarding the hovercraft does not affect this contract.

Additionally, the AEB is working diligently with the Corps, other federal agencies, the State of Alaska, the City of King Cove, King Cove Corporation, and the Agdaagux and Belkofski Tribes as cooperating agencies in the current Environmental Impact Statement (EIS) process directed by the Izembek National Wildlife Refuge Land Exchange Act of 2009. This EIS is being prepared under the direction of the U.S. Fish and Wildlife Service (USFWS) as the lead agency. The USFWS has recently stated its intention to complete the EIS and provide its Record of Decision document by late summer (2012) to the Secretary of Interior for his decision on the land exchange, as required by this Act.

It is the fervent hope of the AEB, the City, King Cove Corporation and the Agdaagux and Belkofski Tribes that the Secretary will approve the land exchange. If so, the road to the Northeast Corner will become a key element in the implementation of the Izembek National Wildlife Land Exchange Act which will authorize the construction of additional road mileage from the Northeast Corner to connect the City of King Cove with the Cold Bay Airport.

If the Secretary does not approve the land exchange, the AEB will develop an alternative transportation link between King Cove and Cold Bay. Any alternative we develop will include the utilization of the road to Northeast Corner and associated facilities, now being constructed under the King Cove Health and Safety Act and COE Permit # 2-2000-0300 Cold Bay 12.

On-going transportation research and development in the Aleutians East Borough is important as all our communities are small, remote, isolated, and marine dependent. A transportation link the Borough is exploring (and we believe holds promise) is an aluminum landing craft/passenger ferry. Please see the attached conceptual drawing. The Borough hopes that this type of a transportation link could be more technically and financially viable than a hovercraft. Such a landing craft/passenger ferry vessel could be designed to carry approximately 30 passengers, occasional wheeled vehicles (in particular an ambulance) and limited cargo. It could use the same route as has been described for the hovercraft in the past. We are looking at building materials and techniques, such as hardening the vessel bottom with replaceable UHMW wear pad to prevent damage to the hull from abrasion on the landing pad, that allow the vessel to use the landing pad at the Northeast Corner which is to be constructed in accordance with the existing plans, specs and permits.

The completion of the current construction as described in the existing COE 404 permit is critical to the overall King Cove Access Project. A landing craft/passenger ferry vessel landing ramp could meet the purpose and need of this Permit.

The AEB thanks the COE staff for all of their work and understanding of the King Cove Access Project and looks forward to continuing our working relationship.

Sincerely,

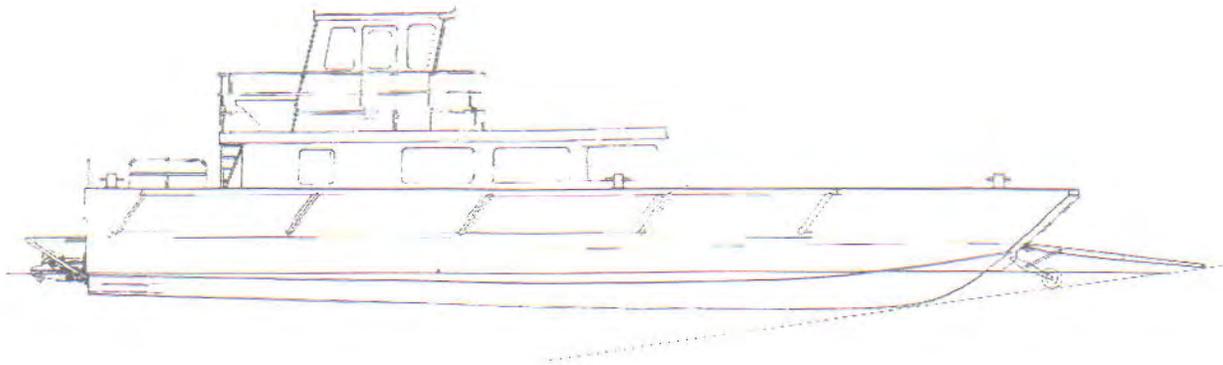
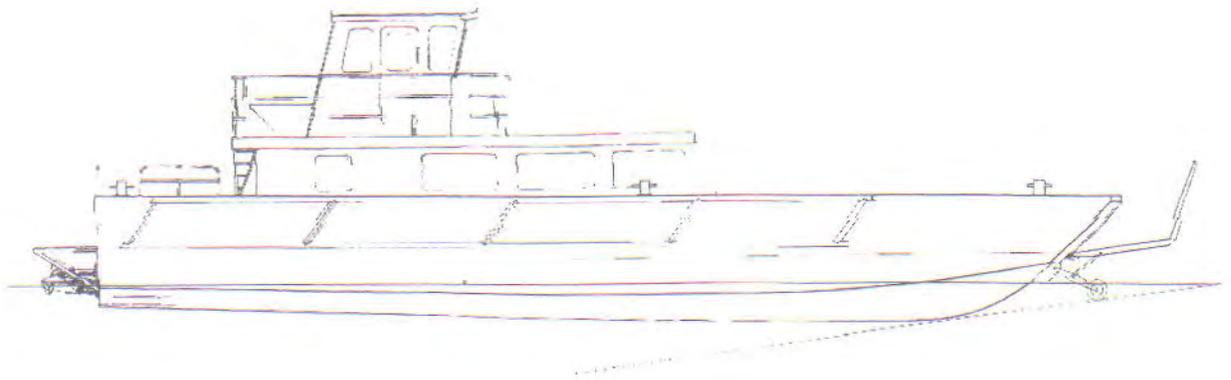
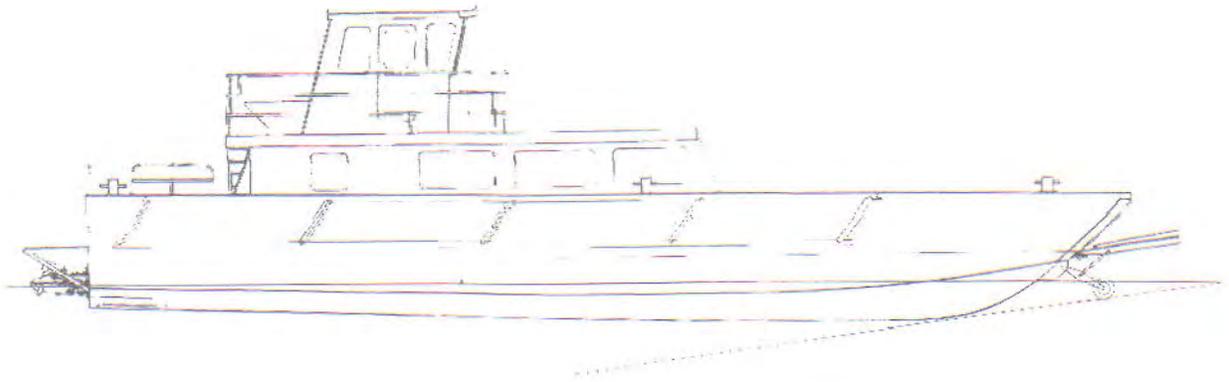
A handwritten signature in cursive script that reads "Stanley Mack".

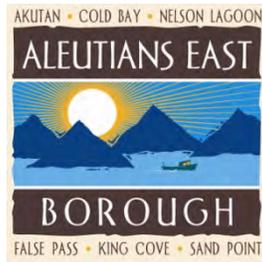
Stanley Mack  
Mayor

Cc: Steve Meyers, Army Corps of Engineers (via email)  
Heather Boyer, Army Corps of Engineers (via email)

# 59' X 16' Landing Craft / Passenger Ferry

Shown with landing ramp in three positions





TO: Mayor Mack and Assembly Members

DATE: December 5, 2011

FROM: Sharon Boyette

RE: Administrator's Report

King Cove Land Exchange and Road Corridor Environmental Impact Statement eats up a lot of my time but I believe we are making good progress. The hovercraft operations in King Cove were "taken off the table" as the no-action alternative in a letter from the Mayor to the FWS dated November 15<sup>th</sup>. We hope that by the time the final EIS is issued everyone will understand that the AEB can't afford to and will not re-start hovercraft operations between Cold Bay and King Cove.

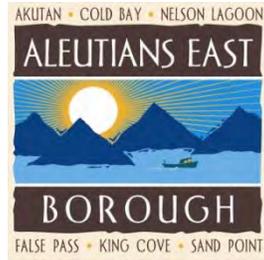
This may present a problem for the Road to the Northeast Corner project which was to provide the facilities for somewhat less costly hovercraft operations. But we are dealing with that fall-out as best we can now.

And speaking of the hovercraft which now sits in Cold Bay on the hovercraft pad. . . . . We have developed a plan for the repair, installation of modifications and re-deployment of the Suna-X in Akutan. The date by which we are expected to have the craft and crew ready for the first airport passenger run is September 1, 2012. With assistance from Kvichak Marine and our consultant, Paul ("Toby") Tobin, we will be ready.

We had some excellent meetings in Seattle during Fish Expo. Our relationship and communications with Peter Pan Seafoods continues to improve with each meeting. We enjoyed a frank discussion about the airport and harbor projects with Trident Seafoods. We met with Kvichak to do the planning mentioned above as well. I thought the fishermen's meeting went well. We also talked with Larry Cotter, CEO of APICDA, about Akutan, False Pass and Nelson Lagoon projects and some of the goals we share for those communities. The AEB booth was great, as usual, manned by AEB and City of King Cove staff.

All our construction projects are on winter break. I'll let you know as they start up again.

As always, I appreciate your questions and suggestions. Please call or email me anytime.



TO: Assembly Members

THROUGH: Mayor Mack

FROM: Sharon Boyette

DATE: March 19, 2012

RE: Sand Point Request for Funding

I would like to offer my opinions regarding the City of Sand Point Request for funding from the AEB's permanent fund.

The AEB owns new harbors in Sand Point, King Cove, False Pass and Akutan and the public docks in Cold Bay, False Pass and Nelson Lagoon. These are facilities that the AEB has agreed in writing (except Akutan Harbor which is in process) to provide for major repairs. Some of the facilities that the AEB owns are in terrible condition and pretty soon there will be no choice but to start repairing them --- or stop using them. The Cold Bay dock will be the first to go down; it is well on its way now.

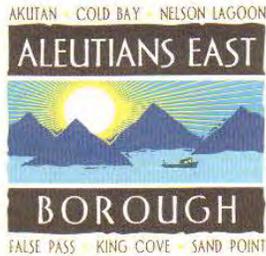
We are about to start running a hovercraft operation in Akutan that --this is just my opinion the business plan has not been updated-- could cost over \$1 Million/year over revenues at least for the first five or so years. The AEB is committed in writing to running and paying for the marine link between Akutan village and Akun airport for the next twenty years.

If you look at the revenue and expenses of the administrative budget, you will see that we budget to spend every nickel that comes in each year.

So, it is pretty easy math. If the assembly intends to keep its permanent fund and even grow it, we cannot pull millions of dollars out for projects and for education and for the hovercraft deficit each year.

Sand Point says the city can't afford a major contribution to repair and renovate the old harbor. I would recommend they speak to the City of King Cove where they went through similar funding pains with their old harbor.

A quick little research produced the following: North Slope Borough has over \$300 M and Valdez has over \$100 M in their permanent funds. Fairbanks North Star Borough has over \$100 M in investment accounts for their various "reserve funds."



TO: Mayor Mack and Assembly Members

DATE: March 14, 2012

FROM: Sharon Boyette

RE: Administrator's Report

Spring must have sprung although you wouldn't know it by looking at the amount of accumulated snow in Anchorage. But I know it has because the construction projects are showing signs of life. The Akutan Harbor construction and the Akutan Airport construction have started up again. Kiewit has 25 people working on Akun Island when I last heard from them with a total of 40 people expected by the end of the month. Knik will be starting up dredging to finish that part of harbor construction as soon as weather allows.

AIC is held back from working the material pit by bear denning/ noise restrictions but the King Cove road to the northeast corner may get going soon without blasting, if rock is already available.

Work on the Akutan hovercraft has begun in Cold Bay. Mechanics are working to de-winterize the vessel and also to make repairs and renovations. We are trying to provide additional reliability by adding a de-icing package and we will make improvements to the bow ramp system. HoverLink, a subsidiary of Kvichak, is working on the permit stipulations, development of safety, operations and route manuals and operations planning. HoverLink has hired a full-time manager in Seattle, Marty Robbins, for his project. He will be in Anchorage to meet with us, Fish and Wildlife and PenAir the first week of April. We anticipate the Suna-X will be in Cold Bay until the first of August when it will head to Akutan.

The King Cove Land Exchange and Road Corridor Draft Environmental Impact Statement was due to be released the end of February – then the first week of March – then mid-March. Well, it is mid-March and we are thinking it may be very soon. The Tribe and City have invited Dan Ashe, lead dog at Fish and Wildlife

Service to King Cove April 2-4. The dates are not confirmed. Stay tuned for news regarding the Draft EIS and KC-CB Road news. . . . .

Legal Matters: I am to be deposed on the terminal construction lawsuit on March 20<sup>th</sup>; others who were involved are also scheduled for depositions this week. I hope that goes well. We are meeting with AML/JIA to discuss the hovercraft shelter; lawyers will be present. We would like to settle that matter without a full-blown legal battle. You will be hearing more about the hovercraft shelter, too. The King Cove School is still leaking – maybe worse than ever. Ray Wetherholdt will be conducting a “leak test” in June which should give us information about the cause of the leaks. Then we will decide how to fix the leaks and how much the repair will cost.

When I have a spare moment or two, I am trying to organize my office for the new administrator. Linda is helping but it is going slowly. It is looking like I will not have time with the new administrator so I am meeting with the staff regularly to talk about what I have learned over the past 21 years, what I know about active projects and where all the bodies are buried. They will help bring him up to speed and avoid all those corpses.

As always, I’m happy to provide more details or hear your concerns. Please call or email me anytime.

## Akutan – Akun Hovercraft Ferry Service Plan

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### I. Summary of the Service

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#### A. The Route

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The ferry route shall be served by a single hovercraft owned by the Aleutians East Borough (AEB) and operated under contract by HoverLink, LLC (HoverLink).

HoverLink is a wholly owned subsidiary of Kvichak Marine Industries, Inc. (KMI). The service route shall be from an improved sea plane ramp located on Akutan Island near the village, to the new airport being constructed on Akun Island. The landing on Akun Island will be via the beach at Surf Bay. There will also be a hovercraft hangar built at the head of Akutan Harbor.

#### B. Service Schedule

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The ferry service will provide the marine link between the new airport and Akutan. Flight schedules to Akun have not been established. HoverLink has already met with Peninsula Airways (PenAir) and they have not yet finalized their schedules. Other airlines may also choose to provide scheduled or chartered service to Akun with passengers and/or freight. HoverLink will respond to the PenAir schedule, and coordinate with other airline arrivals as necessary, to provide the marine link in an efficient manner.

The ferry service may consist of one or two daily scheduled round trips between Akutan Island and Akun Island. The schedule will integrate with future air service into Akun Island by all airlines that establish such service. For example, PenAir currently offers direct service from Dutch Harbor (DUT) to Akutan Island (KQA) using the Grumman G21 Goose sea plane. It is could be anticipated that the new fixed wing service to Akun Island will roughly follow the current schedule, and that is the current assumption of this Plan. The following flight schedule is currently in effect and is operated seven days per week:

- Flight 322 Depart DUT 11:00 Arrive KQA 11:20
- Flight 323 Depart KQA 11:40 Arrive DUT 12:00
- Flight 324 Depart DUT 15:45 Arrive KQA 16:05
- Flight 325 Depart KQA 16:25 Arrive DUT 16:45

The PenAir schedule is subject to seasonal and demand changes, as well as weather limitations on the existing aircraft and facilities. Direct service from Anchorage (ANC) to Akun Island bypassing DUT is also a possibility. PenAir may serve the route with Saab 340 or 340B model aircraft that will have a greater passenger capacity than the Grumman Goose. During peak personnel changes at the Trident Seafood plant in Akutan, additional sailings may be required. Those peak travel times are mid-December to mid-January, mid-March to late April, and late May to late June. Based on the current pattern of flights, a nominal ferry timetable is proposed as follows:

Action	Time	Action	Time
Crew On at Hangar	8:30	Depart Hangar	9:30
Arrival Akutan Village – Load Outbound Pax	9:45	<b>Depart Akutan Trip #1</b>	<b>10:00</b>
Arrive Akun Island – Surf Bay	10:30	Unload Pax	10:45
PenAir Flight Arrives with Inbound Pax	11:20	Shuttle Pax to Surf Bay	11:45
Load Inbound Passengers	11:45	Depart Surf Bay	12:00
<b>Arrive Akutan Trip #1</b>	<b>12:30</b>	Unload Pax	12:45
Depart for Hangar	12:45	Arrive Hangar	13:00
Crew Break at Hangar	13:00	Depart Hangar	14:15
Arrival Akutan Village – Load Outbound Pax	14:30	<b>Depart Akutan Trip #2</b>	<b>14:45</b>
Arrive Akun Island – Surf Bay	15:15	Unload Pax	15:30
PenAir Flight Arrives with Inbound Pax	16:05	Shuttle Pax to Surf Bay	16:30
Load Inbound Passengers	16:30	Depart Surf Bay	16:45
<b>Arrive Akutan Trip #2</b>	<b>17:15</b>	Unload Pax	17:30

Fuel Vessel	17:45	Depart for Hangar	18:15
Arrive Hangar	18:30	Crew Off at Hangar	19:30

The assumed schedule is based on two flights per day, and will be adjusted to any seasonal or timetable adjustments made by the air carriers. The hovercraft crew operating day is therefore 11 hours in duration, with a one hour mid-day break. The vessel will be underway for three hours per day, with two of those hours in revenue service.

### C. The Vessel

The route will be served by the SUNA X, Official Number 1190205 owned by AEB. SUNA X is a BHT-130WD hovercraft and she currently holds a United States Coast Guard Certificate of Inspection (COI) as a Subchapter T vessel. The vessel admeasures at 92 gross tons.

SUNA X and will carry up to 49 passengers with luggage, with an operating crew of up to four, maximum of 53 persons allowed onboard. The vessel can also accommodate one heavy duty pickup truck as cargo. The current COI is attached as Appendix A to this Plan.

### D. The Facilities

AEB is in the process of carrying out all capital improvements at the following hovercraft sites with other agencies; and is responsible for any future or ongoing maintenance needed at these sites as they pertain to hovercraft operations. HoverLink's role will be to provide operational guidance to AEB as requested for all facilities; and to keep AEB informed as to the status of these facilities regarding state of good repair.

- Akutan Village Sea Plane Ramp – RESERVED, pending receipt of information on construction activities, most recent information received from Alaska Department of Transportation (ADOT) is completion of the ramp by August 20, 2012.
- Hovercraft Hangar Site – same as above. We will need to arrange for storage of spare parts, tools, materials, and consumables at this site either in a permanent facility or using shipping containers.

- Surf Bay Landing Area – RESERVED, most recent information from ADOT indicates ramp completion near the end of July 2012.

Additionally, HoverLink’s crew will require shore side logistical and infrastructure support in order to carry out the service. Following is a brief summary of these items; the status of each will be updated as more information becomes available during Phase 2 and an addendum (and possibly a revised budget) to this plan will be issued.

- Utilities – RESERVED, pending information on the utilities (if any) that are available at each of the hovercraft sites listed above. It is assumed that AEB will pay for all utilities at the sites (power, sewage, water, trash disposal, recycling, et cetera). If necessary HoverLink can pay for these items and they would be added to the budget via an addendum.
- Telecommunications – RESERVED, ideally there would be cellular service, land line, and high-speed internet access available at both the sea plane ramp and the hangar. In the event that HoverLink ends up paying for telecommunications, a placeholder value has been included in the proposed budget. There will be a marine band radio installed at the Snow Removal Equipment Building (SREB) at the airport. Additionally, SUNA X is equipped with an aviation band radio for direct communication with arriving aircraft. SUNA X is also equipped with a satellite telephone.
- Housing – RESERVED, suitable accommodation is required for a minimum of four (but ideally six) crew members either in the village or at the hangar site. If suitable accommodation is unavailable, HoverLink is prepared to procure and set up a modular trailer living compound for the crew to support the service (perhaps as a capital cost item versus operating cost). Sleeping accommodations for each crew member are required along with modest living space, basic kitchen and laundry facilities, and a small office space. Information was recently received regarding possible motel/inn space in Akutan via the Akutan Corporation, or the use of construction camp units as that work completes ... more information needs to be developed and the suitability of these options needs to be determined.
- Groceries – RESERVED, it is preferred that the crews provide for their own meal preparation much like a typical firehouse. HoverLink will be seeking information on this regarding the practicality of the approach, and the supply chain logistics. The GSA per diem rate for Dutch Harbor was used to establish a budget for this cost item, see Appendix B. The City of Akutan does have a fully stocked store and meals may be available at the Trident cafeteria.
- Transportation – AEB will be providing a 21 foot Workskiff, Inc. M-Series skiff, with a S-Series cabin and full outfit, for HoverLink’s use for crew transportation between the village and the hangar. The hovercraft itself will be used to shuttle heavy freight or bulky items (oil drums, spare parts, et cetera). Further, AEB will be providing a pickup truck for the crew’s use at Akutan, and a bus will be provided on Akun for shuttling passengers between

the hovercraft and the airport. HoverLink will provide bus driving services to support the marine link.

- Weather Data – RESERVED, data may be available from the airport on Akun for the Surf Bay landing conditions; this would require coordination with the FAA. Ideally we can get wind speed and direction at three points along the proposed route. We are also checking into the feasibility of deploying a wave rider buoy to monitor wave height along the route.

## E. Plan Implementation

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The work to develop this Plan is a deliverable item under HoverLink’s RFEI letter and the resultant letter agreement between AEB and HoverLink as executed on February 21, 2012. Those documents further describe Phase 2 and Phase 3 of this project as follows:

### For Phase 2 (Planning):

- hire all staff;
- finalize operations and safety plans and procedures as contained in this Plan;
- train and certify all staff for the operation;
- develop and finalize the go and no-go protocols;
- finalize maintenance procedures;
- provide demonstrations for United States Fish & Game, United States Coast Guard and other agencies as required or requested;
- all as outlined and described in this Plan, its appendices, and any agreed upon addendums.

### For Phase 3 (Operations):

- provide twelve months of safe, reliable, and efficient hovercraft ferry service;
- be prepared to do any other missions as requested by AEB;
- explore options for other revenue streams such as fuel and vehicular transportation, freight, mail, SAR, medical evacuation;
- all as outlined and described in this Plan, its appendices, and any agreed upon addendums.

## II. Operations

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### A. Route Manual & Wildlife Protection

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The hovercraft ferry service will be operated in a safe and environmentally responsible manner.

These operating requirements are paramount. HoverLink will train the operating crews during

Phase 2 of the project; and the crews will ultimately be qualified to operate and navigate SUNA X on the prescribed route in strict accordance with the AEB approved Route Plan.

Additionally, the crews will be thoroughly trained on all aspects for the protection of the environment, wildlife, marine mammals, fish, and bird resources. In particular, the operating crews will be trained regarding the proper treatment of threatened and endangered species; and their respective habitats. All federal and state laws regarding protection of the environment, wildlife, marine mammals, fish, and bird resources will be strictly followed.

See Appendix C of this Plan for the particulars and details of the *Akutan – Akun Route Plan* and *Wildlife, Marine Mammal, Fish, and Bird Resource Protection Plans*.

## B. Vessel Crewing

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For the Akutan to Akun Island hovercraft ferry route the vessel will normally operate with a fully qualified four person crew consisting of:

- One 100 Ton Master (minimum) – holding a radar observer qualification and hovercraft endorsement;
- One 100 Ton Master as First Officer (minimum) – holding a radar observer qualification and hovercraft endorsement;
- One Hovercraft Engineer/Deckhand – with radar observer qualification; and
- One Qualified high speed deckhand; at all times.

The decision to carry a four person crew is based on relative increase in risk arising from change in operating environments between Cold Bay and Akutan. The decision is also importantly based on the lack of operational data and history on which to conclude that risks maybe acceptable operating with a three person crew.

The strategy regarding USCG minimum manning will be to pursue a new COI that allows for operation of the hovercraft with a crew of only three. Given that the Master and First Officer are

both licensed to fully operate the craft; this will allow for hovercraft operations to continue without interruption should any one member of the crew be unavailable for duty.

Additionally, in this case the start-up costs to the project are relatively unaffected by the increase in student numbers (for example from two to four). The start-up training costs will yield four licensed operators – giving the project some capacity to immediately deal with unplanned personnel turnover or absences in first year.

Note: The COI will require only one hovercraft endorsed pilot onboard – the second license need only provide radar guidance.

Future risk analysis may conclude the route can be served with a three person crew at which point HoverLink and AEB can analyze the risk/benefit of making that change; versus ramping up with a second pilot training scheme in future.

Therefore, it is proposed that the service will be staffed by two four person operating crews, each consisting of one Captain (or Master), one First Officer, one Hovercraft Engineer, and one Deckhand. Each crew will work a shift rotation of three weeks on and three weeks off the vessel. All eight crew members will be direct employees of HoverLink and will report directly to the General Manager.

The oncoming crew will assemble in Seattle, WA on the day prior to their rotation date and will meet with the General Manager. This crew will then travel together from Seattle to Akutan on the scheduled rotation date. Once on-site both crews will participate in a turnover period where operational, maintenance, and logistical details will be shared with the oncoming crew. Once turnover of the route to the oncoming crew is complete, the off going crew will return to Seattle and meet with the General Manager prior to starting their three week off period.

Note: In the event that hovercraft ferry operations are reduced to one scheduled trip per day, a two day split crew turnover will be utilized to preclude a situation where one crew hands off to

the other at Surf Bay with minimal turnover time. Examples of these crew swap scenarios are included as Appendix D.

See Appendix E of this Plan for complete crew position descriptions, including key activities, responsibilities, job content knowledge, and required communication skills. The Captain, First Officer, and Deckhand will also assist the Hovercraft Engineer as required for preventative maintenance and repair activities; exercising the “total team” approach to operational safety, reliability, and service efficiency.

### C. Maintenance Crewing

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As outlined above in Section II.B, it is proposed that each crew include a Hovercraft Engineer to provide for proper daily vessel preventative maintenance and repairs.

See Appendix E of this Plan for a complete position description, including key activities, responsibilities, job content knowledge, and required communication skills. The Hovercraft Engineer will also assist the Captain, First Officer, and Deckhand as required for vessel navigation and underway operations.

HoverLink proposes to augment the skill set and experience of the Hovercraft Engineers with the consulting services of Hovertek (Mr. Paul Tobin). These services will be provided on an as needed basis and will be overseen by the General Manager. Specific ongoing support will be provided in these areas:

- audits and inspections of maintenance reports, records, and procedures;
- audit of craft technical and master log books;
- provide advice and recommended solutions to HoverLink personnel upon request with 24/7 telephone support;
- provide additional specific hovercraft maintenance training as requested;
- provide on-site certified hovercraft engineer to assist or augment the crew if required and subject to availability; and

- provide on-site BHT 130 experienced Pilot in Command (as an advisor to the crew) on an as required basis.

#### D. Preventative Maintenance & Repair Plan

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Hovercraft SUNA X shall be maintained in accordance with the manufacturers recommended service schedule and approved maintenance manual and procedures.

##### References:

DOC.066 BHT130WD Maintenance Manual  
DOC.065 BHT130WD Type Operating Manual  
CFR 46 Subchapter T parts 175 thru 185  
Hoffmann - Propeller Operation and Maintenance Manual No - E765A

Suitable maintenance and operation of this type of hovercraft includes:

1. Ensuring that up to date records are maintained, to include the following:
  - A) Operating hours
  - B) Any damage or defects which may affect the safe operation of the craft
  - C) Any incidents or unusual occurrences, including particularly severe weather conditions
  - D) All modifications or design changes approved by the manufacturer and USCG MSO
  - E) All service bulletins issued by the manufacturer
2. Daily Inspections:
  - A) Daily inspections are conducted by maintenance staff on a pre and post flight basis.
    - All defects are recorded in a craft technical log and are signed off as rectified or as a deferred defect
    - Craft is certified as *serviceable* by maintenance personnel and all findings, rectifications and signatures are noted in the technical log book
  - B) The Daily Inspection consists of inspecting and recording the following items pre flight:
    - All Fluid Levels - engine oils, coolant, hydraulic fluid etc. level and any addition
    - Engine hours – pre and post flight
    - Craft Hour Totals
    - Structure
    - Electrics
    - Engines
    - Propellers
    - Lifts Fans & shaft components
    - Control Systems
    - Skirt Systems
3. Major Inspections and Preventative Maintenance/Service:

Preventative maintenance and service shall be accomplished in a block check methodology consisting of inspection and servicing at every 50 hour interval of craft operations. The block check method consists of 20 separate checks and service over 1000 hrs of craft operations and is a proven technique adapted from the aircraft industry with the focus on safety and ensuring reliability.

Maintenance personnel refer to the block check service schedule and sign off on the related tasks as completed. This procedure occurs @ every 50 hours of craft operations until 1,000 hours is achieved. Once a particular block check is completed it is noted in the craft master and technical log book. At every 1,000 hour milestone the block check method defaults to Block 1 check 1 and the process repeats. See Appendix F and table below for *current* SUNA X schedule and block check sign off sheets, as an example:

**Block Check Service Schedule**  
**SUNA X BHT 150WD**

	Check 1	Check 2	Check 3	Check 4
Block 1	1050 hrs <i>Complete</i>	1300 hrs	1550 hrs	1800 hrs
Block 2	1100 hrs <i>Complete</i>	1350 hrs	1600 hrs	1850 hrs
Block 3	1150 hrs <i>Complete</i>	1400 hrs	1650 hrs	1900 hrs
Block 4	1200 hrs	1450 hrs	1700 hrs	1950 hrs
Block 5 *	1250 hrs (oils)	1500 hrs (oils)	1750 hrs (oils)	2000 hrs (oils)

\* - indicates oil changes every 250 hours

**E. Safety Management**

The United States Coast Guard recommends the use of Safety Management Systems in all commercial passenger carrying services – irrespective of vessel size or class of voyage. HoverLink endorses this recommendation fully and has as a consequence developed a comprehensive suite of

standing orders, instructions and guidelines as operators of the SUNA X for the Akutan to Akun hovercraft ferry service. The documents are a Safety Management System (SMS) and provide guidance and direction for all employees to safely and effectively deliver the marine link connecting Akutan with Akun Island. The SMS is constituted of ten chapters – commencing with Standing Orders, and concluding with the vessel manufacturer’s type operating manual. These documents are “controlled” in that each chapter is assigned an alpha numeric designation with an approved company signature band and date. In this way Captains and crews can and should help “evolve” the safety management system based upon their operational experiences in and around the passenger service. Suggestions for change which have been approved by the company are in turn issued or re-issued with new tracking numbers. Operational crews will review parts of the SMS during each Occupational Safety Meeting – which are typically held once every 3 weeks. HoverLink will be tailoring the existing SMS for SUNA X to the Akutan to Akun route as part of Phase 2. The tailored SMS will become Appendix G (currently RESERVED) of this Plan when it is complete.

## F. Security

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The SMS for this hovercraft ferry service contains specific and detailed information regarding safety and security procedures to be followed by the HoverLink crews in carrying out the service.

As this is a USCG Subchapter T vessel, HoverLink believes that we will not be required to operate under an approved vessel or facility security plan, as would be required under the Marine Transportation Security Act (MTSA). Regardless, HoverLink will coordinate with USCG personnel and confirm this assumption.

Currently there is no TSA screening process out of ANC and onwards to AEB on flights operated by PenAir. There is some information out there that indicates that this practice may be changing. HoverLink will meet with the air carrier and discuss any issues. For the purpose of this Plan and proposal we assume that there will be no security requirements enforced upon the ferry service.

## G. Operating & Environment Permits

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Any and all permits required for the service shall be paid for and secured by AEB. HoverLink will assist AEB as requested with technical and operational data. AEB shall communicate any future operating or environmental permit requirements to HoverLink for inclusion in future addenda to this Plan.

HoverLink will incorporate all known permit requirements into the respective operational and route manual documents.

## III. Management & Administration

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### A. Organization Chart

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An organizational chart for the service is provided as Appendix H.

### B. Position Descriptions

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Position descriptions for all HoverLink staff are contained in Appendix C of this Plan.

### C. Communications

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The General Manager will bear the primary responsibility for all communications between HoverLink and AEB; and prospective partners such as PenAir, other airline partners, and Trident. When completed, the SMS (Appendix G) will provide further details on communications internal to the HoverLink staff; and for notifications to outside agencies necessitated by ferry operations that are typically made by the crew.

HoverLink commits to providing the required communication links on a 24/7/365 basis in support of the hovercraft ferry service. The General Manager will nominally be available at all times and serve in an on-call status. During times of vacation, illness, or while otherwise out of cellular phone range, the General Manager will delegate the on-call responsibility to one of the off-duty Masters or First Officers, or to another person knowledgeable of the service (e.g., KMI management staff).

## D. Reports

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HoverLink will provide the following routine administrative reports to AEB, and will keep copies on file. These data reports will be generated by the crews, and the back office staff at KMI as part of the General & Administrative effort:

- monthly ridership and freight data, cumulative and by airline
- monthly fuel consumption
- monthly spare parts usage
- monthly emergent repair activity
- monthly vessel and machinery hour summary
- quarterly preventative maintenance summary
- quarterly budget update and true up
- quarterly Army Corps of Engineers ridership data
- annual Army Corps of Engineers vessel summary
- annual Drug & Alcohol Testing results to the USCG and FTA
- any inspection reports or other correspondence received from outside regulatory agencies (USCG 835)
- any complaints received from ferry customers or service partners, along with HoverLink's resolution of same
- AEB will be copied on all HoverLink outgoing correspondence to outside regulatory agencies
- any reportable marine casualties or incidents (USCG 2692)

In addition, the Masters will be responsible for maintaining all required logs and records on the vessel and at the Akutan office facilities; and for generating any required reports per the SMS.

## E. Insurance

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RESERVED - KMI is currently working with AEB and its insurance brokers on the insurance coverage issues. The efforts at this point are twofold: a) ensure that the AEB provided coverages are appropriate and offer the best insurance value for AEB, and b) ensure that all parties are fully insured and protected for the services being rendered. It is hoped that a single policy can be assembled to provide the total depth and breadth of insurance required. In the event that gap insurance coverage is required to fully insure both AEB and HoverLink for ferry operations, we propose that those premiums be billed to AEB directly. Therefore we have not included any provision in the budget for insurance premiums.

## F. Invoicing & Payment Procedures

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### 1. Invoicing

HoverLink shall invoice AEB once per month, at the end of each calendar month based on budgeted amounts as mutually approved. Within 45 days of the end of each calendar quarter a “true-up” invoice shall be submitted to adjust for the difference between budgeted (pro-forma) costs previously invoiced and actual costs incurred. Invoices will be electronically mailed to AEB by the General Manager in the form of a PDF file on the last weekday of each month. Books and records in support of actual costs for the cost plus portion of invoices shall be available at the corporate headquarters of KMI in Seattle, Washington. These records may be reviewed by the AEB in Seattle at a prearranged time of mutual convenience. See Section V and Appendix B of the Plan for more detailed information and budgets and monthly pro-formas for Phases 2 and 3.

### 2. Payments to HoverLink

Payment for each invoice sent to AEB shall be due within 15 calendar days of the date of the invoice. Payment shall be via wire transfer directly into the bank account of HoverLink. HoverLink will provide bank wire instructions under separate cover.

### 3. Payments to HoverLink Employees and Vendors

KMI has set up HoverLink as a completely separate entity in its corporate payroll, accounting software, and related financial systems; including separate bank accounts. HoverLink will be setup to make payments to HoverLink employees and all vendors who provide services directly in support of HoverLink operations for AEB. Strict separation of all financial transactions shall be maintained between KMI and HoverLink.

## G. Fare Revenue & Ticketing

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HoverLink will not collect fares (cash or credit cards) directly from hovercraft ferry passengers or produce tickets. All passenger fare and freight revenues will be collected by the airlines serving the Akun airport. HoverLink operating crews will count passengers, and document the weight and volume of any freight items. We will create and provide the appropriate records so that AEB can be accurately reimbursed for all marine link transportation services provided directly by the airlines serving Akun, see Section III.D.

HoverLink will assist AEB as required to determine tariffs and fee structures (including revenue sharing) for other potential services such as freight, fuel and vehicular transportation, medical evacuation, SAR, mail delivery, et cetera.

HoverLink will coordinate as necessary with partners such as PenAir and any other airline serving Akun to arrange for package deals, and Trident to make any fare revenue or ticketing system work in an efficient and auditable manner. Throughout Phase 2 and Phase 3 HoverLink will take the lead to identify and secure new and/or increased revenues for the service, see Section V.J for additional information regarding this effort.

## IV. Staff

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### A. HoverLink Staff Size

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In 2010 AEB applied for and received an amendment to the USCG COI for crew level on the SUNA X. The original four person crew which included:

- One Master (100Ton minimum);
- One Radar Observer; and
- Two Deckhands at all times.

Permission was received to reduce the crew to a total of three with the following designations:

- One (1) Master;
- One (1) Senior Deckhand (High Speed);

- One (1) Qualified Deckhand (High Speed) at all times;

with Deckhands trained in accordance with NVIC's 5-01, Ch1 and 1-91, CH1 respectively.

For the new hovercraft route from Akutan to Akun Island, HoverLink proposes that the vessel will operate in year one with a crew as detailed in Section II.B of the Plan. For the purposes of this Plan, HoverLink will then consist of nine total direct employees as follows:

- General Manager (GM)
- Two Captains
- Two First Officers
- Two Hovercraft Engineers
- Two Deckhands

Position descriptions for all operating staff are detailed in Appendix E of this Plan. The two operating crews will be designated as Crew A and Crew B. The GM will establish a strong personal presence in Akutan in support of the service, the community, the regulators, and the various partners; generally as follows:

- During Phase 2 planning and training, nominally two weeks per month on-site, and as needed
- During the second half of Phase 3, nominally one week per month in Akutan, and as needed

The GM has already been hired and will start working as a direct HoverLink employee upon AEB approval of this Plan; his first visit to Akutan will occur April 19-20, 2012 weather permitting.

The two hovercraft operating crews will be recruited nationwide. It is anticipated that crew members will live wherever it suits each individual. The crews will travel to Seattle independently and at their own cost; and assemble as a team prior to departure day for Akutan. These operating

crews will go “on the clock” at the time of their on-coming briefing in Seattle, and they will come “off the clock” upon completion of their off-going brief to the GM in Seattle following their three week shift. All vessel crew of HoverLink will be salaried to mitigate overtime labor costs, and all will execute a marine employee contract that covers all aspects of rotational and off-site employment.

Note: If a crew member normally lives between Seattle and Anchorage, or in Alaska; then final crew assembly would occur in Anchorage. That person would go “on the clock” upon crew departure to Akun.

Should it become necessary at some point in the future, HoverLink may hire an administrative assistant to supplement the staff.

## B. Recruitment

HoverLink will advertise for crew positions starting in mid-April; with postings given the widest possible dissemination. HoverLink will also be advertising within the borough for employees. It is anticipated that a short list of interviewees will be determined by the end of April. In person interviews will be held in Seattle during early May and job offers will be made shortly thereafter. In order to support the required training program, the effective hire date for the crews will be early June.

## C. Human Resources

KMI will provide human resource services to HoverLink as necessary to advertise for, recruit, hire, administer, retain, and replace as necessary all HoverLink employees. Employee policies, procedures, administration, and benefits will be generally comparable between employees of KMI and HoverLink. These services are provided as part of the fixed monthly G&A cost; see Section V and Appendix B of this Plan.

## D. Training

The level of training required is very difficult to predict or estimate given the fact that crews have not yet been hired. For example, we could find, recruit, and hire a core group of very experienced hovercraft mariners (ex-US Navy for example) that require only basic familiarization training with SUNA X, and some route specific training at Akutan and Akun. On the other hand we could find ourselves hiring very capable and experienced mariners, but with little or no hovercraft experience at all. So the range in the “training level of effort required” is quite broad. This means that the cost to provide this training is equally hard to predict with any certainty. Another uncertainty and unknown that affects training (and its cost) is the weather factor. Given the weather in King Cove, Cold Bay, and the Akutan area there will be days when instructional staff are on-site but weather conditions preclude underway training time. We propose below that each Captain and First Officer accrue 40 hours of Pilot-In-Control time, and we will have to train and certify four. Additionally, we are building in an additional 40 hours of underway training time for instructor reconnaissance of the Akutan to Akun route; and full development and refinement of the “go/no-go” matrix with each crew.

HoverLink will provide all required training of hovercraft operations personnel during Phase 2 of the contract with AEB; all training will be complete prior to the start of ferry service. The training program summarized below is an example of the training regimen for the Captain (or Pilot) of the vessel, the most arduous and challenging position on the crew. Similar training will be undertaken for all other crew members.

## **PILOT TRAINING - PROGRAM SUNA X**

### **1.0 INTRODUCTION**

Controlled documents have been developed to guide an Air Cushion Vessel Master Instructor – approved by USCG and designated by HoverLink – in the pilot and navigation training evolutions required to make a certified deck officer (here-in-after described as a

Student) competent to serve in commercial operations aboard the hovercraft SUNA X.

Successful completion of this training program will permit the Trainee to safely operate the vessel within the manufacturer’s prescribed operating envelope.

## **2.0 METHODOLOGY**

The course follows a 240 hour training progression from a classroom environment covering ‘ground school’ topics - to final consolidation evolutions requiring real-time pilot and navigation skills at sea. There are four modules to this training scheme:

- 2.1 principles and theory of Air Cushion Vehicles and BHT-130WD SMS;
- 2.2 craft systems and maintenance training;
- 2.3 basic piloting and control of the BHT-130WD;
- 2.4 principles of the safe operational envelope, individual and team high-speed navigation skills under radar guidance.

160 total hours of mission time must be accumulated on the SUNA X as part of the USCG endorsement requirements; this will yield four fully credentialed hovercraft pilots. Forty (40) of these hours will be as “pilot-in-control” with 15 hours providing radar guidance. Trainees will track these hours in a personal pilot logbook which will be made available to USCG examiners upon request. Upon successful completion of the training program the approved instructor authority will issue an “attestation of training completion” to each trainee. The attestation must be presented to the USCG regional examination center in order to obtain a Hovercraft endorsement to their marine certificate – which will authorize them to operate the SUNA X.

## **V. Budget**

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The estimated budget for Phases 2 and 3 is attached as Appendix B of this Plan. The following paragraphs provide a brief narrative of the budgeting thoughts, assumptions, and methodology for

each of the budget line items. The first page of Appendix B is a summary sheet, showing total cost by both line item and phase, and a grand total. The proposed monthly pro-formas for each phase are also shown. Subsequent pages of the budget show details, quantities, unit costs, et cetera.

Careful and prudent management of the budget is critical. It shall be the responsibility of the General Manager to keep AEB completely informed regarding budget performance. Significant budget anomalies will be brought to the attention of AEB immediately for resolution; typically these would involve some mechanical failure necessitating expensive repair services or parts that go well beyond the respective budget line items.

Additionally, the GM will produce a budget update on a quarterly basis along with the true-up budget accounting numbers.

For certain costs items such as the consumables, vendors, and maintenance and repair the costs have been pro-rated across Phases 2 and 3 according the ratio of anticipated vessel hours.

#### A. Labor

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All HoverLink employees are to be salaried to preclude overtime, all will be considered to be employed in Seattle, WA or Alaska for tax and employment law purposes. Detail Sheet 2 shows the estimated direct and indirect labor costs. Salaries for crew, and consultant days required, are best estimates only at this time. During the hiring phase HoverLink will endeavor to deliver highly qualified and experienced crew hires at these rates, or lower if possible. Compensation for the GM is set. For the operating crews, there will be “day-rate” adjustments in their employment contracts to account for extra or fewer days worked in any given payroll period. Provisions will also be made for per diem if crews are stranded in a non-duty status due to weather or transportation delays. To cover this cost we have included a 5% direct labor contingency in the budget; see Sheet 2 of Appendix B. See Section IV.D above for further discussion concerning the broad range of potential

training costs; and their potential impact on overall labor costs. We have aimed near the middle of the range with our estimates.

HoverLink will also be utilizing the services of consultant labor for both phases; these gentlemen are already working on Phase 1 as agreed, and are well known to AEB. There is heavy consultant involvement in Phase 2, and a much reduced role foreseen in Phase 3. They have all indicated a day rate to cover their travel and working time. They will be traveling to Seattle during the crew interview process and possibly for some classroom training, otherwise they will be traveling to Cold Bay or Akutan for on-site and on-vessel work. HoverLink will assist as necessary to ensure that these Canadian citizens have the appropriate credentials to work in the United States.

## B. Travel & Per Diem Costs

Costs for crew, staff, and consultant travel and per diem are detailed on Sheet 3 of the budget, split out for each phase. All costs for airfare and lodging are best estimates or placeholders at this point pending resolution of previously RESERVED items of this Plan.

Regarding airfare, HoverLink has teamed up with US Travel – Fisheries Division in order to procure air travel with the required flexibility and best pricing. We will also speak with PenAir about possible airfare arrangements. As previously mentioned, crews will be responsible for their own travel between the lower 49 and Seattle.

Regarding lodging and accommodation see the discussion in Section I.D of the Plan. Included here as a placeholder we have accommodations both in Cold Bay/King Cove and Akutan for crews, the GM, and the consultant team. For CB/KC we have identified a suitable accommodation at \$4,500 per month. For Akutan we are still researching the options as previously discussed. Once the Akutan picture comes into focus for crew housing, we will prepare a budget addendum for AEB approval.

Crew, GM, and consultant per diem is set at the currently approved federal rate of \$102 per day as determined by the GSA for Dutch Harbor. Likewise, we have used the GSA rate as an estimate for any hotel stays that may be incurred. As with airfares, we are working with US Travel to secure better hotel deals in Seattle, Anchorage, and Dutch Harbor. HoverLink will bill for any required hotels at actual cost.

### C. Maintenance & Repairs

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There is no detail sheet for repairs, for preventative maintenance costs the labor is included in crew labor, and the associated consumables are spoken to in Section V.D below. In terms of emergent (unplanned) maintenance and repair work; predicting what might break during any given year of ferry operations is difficult at best. While preventative (planned) maintenance costs are well understood and easy to budget for, emergent repairs are much more random in nature. To mitigate the risk certain spare parts are being procured in support of the service under KMI's separate efforts to prepare the vessel for service, see Section VI.A below. Our philosophy will be to have critical spares on the shelf and to maintain that stock at all times; especially difficult or long lead time items.

As a starting point and place holder, we have examined historical repair cost histories for other ferry services and determined that repairs typically run at about 15% of the total cost of all other direct costs. Therefore we are using that value as a first estimate. As mentioned above, HoverLink will provide AEB immediate notification in the event that the need for expensive repairs becomes apparent. As the craft sees regular service over the first years this number will become somewhat easier to predict.

### D. Consumables

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Sheet 4 of the budget shows the anticipated costs for consumables for the first 1,200 hours of craft operation. In order to get best value for known consumables, we will buy items in bulk out of

Seattle and arrange for cost effective shipping to Akutan and/or Cold Bay. We will purchase a one year supply of given items being mindful of any shelf life limitations. The combined value of consumables and spare parts will necessitate the need for secure and dry storage. All items will be inventory controlled; and we will set up a system to track usage and provide for cost effective replenishment. As with all direct costs, HoverLink will bill only the actual cost incurred and will stretch AEB's budget dollars to the greatest extent possible.

#### E. Vendors

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Sheet 5 of the budget shows estimates for the service of outside vendors in support of hovercraft operations. In some cases these are services that may or may not be required, but we felt it prudent to put some budget in for them regardless. In some cases these are skill sets that the crew will not have, and are best performed by outside repair technicians.

Undoubtedly the need for other vendors or specialized services may arise. Based on details that emerge in Phase 2 regarding facilities and ongoing efforts to prepare SUNA X for training and service, this budget category may be revised via addendum.

#### F. Fuel

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Fuel for the vessel will be provided by Trident and shall be paid for directly by AEB. Information received from Hermann Scanlan has indicated that Trident Seafood is the best source for providing fuel to the operation as the City of Akutan does not have the requisite capacity. We anticipate that the vessel will consume approximately 77 gallons per hour of operation. Given two airline flights per day and the training requirements of the Plan, that works out to approximately 1,200 vessel operating hours total for Phase 2 (training) and Phase 3 (first year of operation). Therefore AEB should plan on purchasing 92,000 gallons of diesel fuel to cover hovercraft operations for the period June 1, 2012 through August 31, 2013. This calculation is shown on Sheet 4 of Appendix B. HoverLink will fully document all fuel deliveries from Trident and provide the requisite reports.

## G. Insurance

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As mentioned in Section III.E, there may be a cost to AEB for any premium associated with gap coverage needed by HoverLink to provide the service. In the event that gap insurance is required, that will be billed directly by the insurance carrier to AEB.

## H. Fixed Fees & Taxes

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KMI has proposed a fixed monthly fee for General & Administrative support of HoverLink at \$12,000 per month for the first year. KMI feels that this value covers the actual efforts for human resources, accounting, accounts payable, logistics, planning, payroll, record keeping, and other administrative costs. AEB should not be exposed to escalating G&A costs that would be calculated on a percentage basis, as the aforementioned efforts should be fixed and independent of the other operational direct costs.

HoverLink will incur business and occupation taxes (B&O) taxes on gross receipts, payable to the State of Washington and the City of Seattle at the rates indicated on the budget summary sheet. These percentages are calculated against the subtotal of direct costs and G&A; but not against profit even though it is taxed as part of the gross receivable.

The budget proposal does not include any other business related taxes; as none are known at this time. However, employer paid taxes, sales tax, and other taxes on airfare, hotels, consumables, et cetera are included in the budget as presented.

## I. Legal

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HoverLink has proposed a placeholder amount of \$10,000 for legal expenses incurred as part of Phase 2 startup. We are retaining legal assistance to create marine employment contracts for the crew, review insurance coverages to ensure no gaps, to prepare a form of contract between AEB and HoverLink, and to ensure any visa requirements are verified regarding use of Canadian consultant services in the United States.

## J. Profit

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HoverLink has established a profit margin of ten percent (10%) taken on all direct costs and fixed fees. *[[ALTERNATE DRAFT LANGUAGE follows: AEB and HoverLink agree that the profit margin will be fixed at ten percent (10%) taken on all direct costs and fixed fees for the Phase 2 planning and training efforts, and for the first six months of Phase 3 ferry service. Both parties further agree that after the first six months of Phase 3, revenue levels and prospects for the marine link we be assessed. At that time, and contingent on mutual agreement, the base profit margin of ten percent (10%) may be reduced concurrent with establishment of a percentage based revenue sharing agreement for new or increased revenues above an agreed upon base revenue number. During Phase 2 and all of Phase 3 ferry service, HoverLink will take the lead on identifying and securing new and/or increased revenue sources to the mutual benefit of all parties.*

## VI. Implementation Schedule

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Separate from this Plan, efforts to make the vessel ready for service are already underway by KMI. AEB has contracted KMI to accomplish the refit effort on SUNA X that is required to put the craft back in to passenger service. The scope of this effort consists of normal maintenance and repair, capital improvements, top-end engine overhaul of all four engines, and provisioning of critical spare parts. Specific work items include complete major overhaul items such as repair of the engines and replacement of the propeller hubs, installation of anti-icing systems, preparation

for USCG inspection, and other needed repairs. KMI will have a crew on station in Cold Bay starting on or about April 30, 2012, and the repair effort is expected to take four to six weeks. The craft will be operational and available for training no later than June 1, 2012 pending any unforeseen circumstances. Any repair efforts that need to carry on past that date will be coordinated between KMI and HoverLink so as not to affect the training schedule.

If HoverLink personnel are available in advance of June 1, 2012, the operating crew could be sent to Cold Bay to assist KMI's mechanical crew, and potentially offset some of the labor required. Participating in the refit would allow the operating crew additional time on the craft and greatly accelerate their familiarization with the operation and repair of the craft systems.

The milestone schedules for Phase 2 and 3 are presented as follows:

#### A. Phase 2

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- HoverLink and KMI begin all processes for Phase 2 – April 2
- HoverLink travel to ANC to meet with AEB, PenAir, USF&G – April 5-6
- This Plan approved by AEB, notice to proceed – April 10
- Finalize position descriptions – April 12
- HoverLink completes form of contract, sends to AEB for review – April 13
- Release advertisements for crew hiring – April 13
- Insurance issues resolved – April 15
- Site visit by GM to Akutan – April 18-20
- Marine employment contracts ready, visa issues for consultants resolved – April 27
- Amend budget and Plan as necessary – April 27
- AEB/HoverLink LLC contract finalized and executed – April 30
- Hiring interviews – May 7-9
- Negotiations with top 12 candidates – May 14-16

- Final crew selections, employment contracts signed – May 18
- Revise budget and Plan as necessary – May 22
- Pre-employment physicals and screening – May 21-25

Crew employment to be effective – on June 1

- SUNA X ready for training – June 1, see Appendix J for more schedule information
- Craft training for Crews of King Cove and Cold Bay – June 6 to July 30 (nominal)
- Update Route Manual and SMS as necessary – July 15
- Reposition SUNA X to Akutan – July 31
- Fish & Game demos and USCG COI efforts finalized – August 3
- Route specific training for Crews out of Akutan – August 1-28
- Finalize Route Manual, Service Matrix, and SMS as required – August 15
- Vessel and crew ready for service – August 29

## B. Phase 3

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HoverLink will have the vessel and the crews ready to begin ferry service on August 29, 2012 and will operate the service in accordance with the contract, this Plan, and its appendices.

END OF THE PLAN

**King Cove to Cold Bay Corridor Road Extension****FY2013 Request: \$4,000,000****Reference No: 49675****AP/AL:** Allocation**Project Type:** Construction**Category:** Transportation**Location:** King Cove**House District:** Bristol Bay/Aleutians (HD 37)**Impact House District:** Bristol Bay/Aleutians (HD**Contact:** Pat Kemp

37)

**Estimated Project Dates:** 07/01/2012 - 06/30/2019 **Contact Phone:** (907)465-3900**Appropriation:** Surface Transportation Program**Brief Summary and Statement of Need:**

This project will complete the road from King Cove to the hovercraft terminal on the King Cove side of the King Cove-Cold Bay Connector.

<b>Funding:</b>	<u>FY2013</u>	<u>FY2014</u>	<u>FY2015</u>	<u>FY2016</u>	<u>FY2017</u>	<u>FY2018</u>	<u>Total</u>
Fed Rcpts	\$4,000,000						\$4,000,000
<b>Total:</b>	<b>\$4,000,000</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$4,000,000</b>

<input checked="" type="checkbox"/> State Match Required	<input type="checkbox"/> One-Time Project	<input type="checkbox"/> Phased - new	<input checked="" type="checkbox"/> Phased - underway	<input type="checkbox"/> On-Going
9% = Minimum State Match % Required		<input type="checkbox"/> Amendment	<input type="checkbox"/> Mental Health Bill	

**Operating & Maintenance Costs:**

	<u>Amount</u>	<u>Staff</u>
Project Development:	0	0
Ongoing Operating:	0	0
One-Time Startup:	0	
<b>Totals:</b>	<b>0</b>	<b>0</b>

**Additional Information / Prior Funding History:**

FY11 - \$15,000,000.

**Project Description/Justification:**

In 1998, Congress appropriated funding under the King Cove Health and Safety Act for improvements to the King Cove medical clinic and airport and to fund a marine transportation system link (the hovercraft) between the two cities. Since August of 2007, the Aleutians East Borough has operated commercial hovercraft service between King Cove and Cold Bay. This project would construct a long term, year-round road from the community of King Cove to the new hovercraft landing site that provides a reliable and safe mode of travel for transporting medical emergency patients during adverse weather conditions.

The Aleutians East Borough will own and maintain the road.

This project contributes to the Department's Mission by reducing injuries, fatalities and property damage and by improving the mobility of people and goods.

## **APPENDIX G-3**

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### **SAMPLE COMMENT LETTERS**

#### **F. Examples from organized form letter campaigns**

Organization	Form Letter Text	Email Subject Line
<b>The Sierra Club</b>	<p>The Izembek National Wildlife Refuge in the Aleutian Islands of Alaska is a beautiful and wild landscape, home to endangered animals like sea otters, eiders, and Stellar Sea Lions.</p> <p>A proposed road through this refuge would require extensive development, construction and maintenance, forever altering this fragile ecosystem. A road would fragment the ecological heart of the wildlife refuge, repeal Congressionally-designated Refuge Wilderness, and permanently compromise a Wetland of International Significance and Important Bird Area. The Izembek Land Exchange/Road Corridor Draft Environmental Impact Statement includes a No Action Alternative, which the U.S. Fish and Wildlife Service should propose as its final recommendation.</p> <p>The road proposal violates the purposes and mission of the refuge and sets a bad precedent for Wilderness designation. All of society has a stake in retaining these long-standing protections by the government and its agencies. The road proposal is not in the public interest, Adopt the No Action Alternative.</p>	No road through Izembek
<b>Defenders of Wildlife</b>	<p>As a supporter of Defenders of Wildlife, I strongly oppose the proposed land exchange that would allow a destructive and unnecessary road through Izembek National Wildlife Refuge, and urge you to support a No Action alternative.</p> <p>Izembek Refuge is a special place. More than 90 percent of the refuge is designated as Wilderness, and it is recognized as a Wetlands of International Importance by the Ramsar Convention. It is one of Alaska's most ecologically unique refuges, with stunning lagoons and tundra habitat that support brown bears, wolverines, caribou and tens of thousands of migratory birds.</p> <p>The proposed land exchange and destructive road that comes with it would devastate this unspoiled place. It would blaze an expensive and unnecessary road right through the heart of Izembek, disturbing the fragile habitat and sensitive wildlife that live there.</p> <p>The road would also cost taxpayers at least \$23.4 million and address a problem already solved by Congress in 1998.</p> <p>Back then, Congress passed the King Cove Health and Safety Act that set aside \$37.5 million to improve medical and transportation facilities in the community of King Cove, including a \$9 million hovercraft to provide emergency marine transport to Cold Bay. The law put in place a system that has already saved</p>	Izembek National Wildlife Refuge DEIS

lives -- and specifically prohibited a road through the Izembek's federally protected Wilderness.

The proposed land exchange would allow for about 150 acres of designated Wilderness within Izembek National Wildlife Refuge to be withdrawn for construction of the road. Such a transfer would remove federal protections and set a terrible precedent that threatens other refuges and wilderness areas.

The road would go directly through highly sensitive habitat and would impact many vulnerable species -- including the threatened Steller's eider, nearly the entire population of Pacific black brant and emperor geese, along with grizzly bears, salmon and the other wildlife that depend on Izembek National Wildlife Refuge.

I urge you to keep Izembek Refuge protected by rejecting this harmful and costly road and land exchange, and I look forward to hearing from you on this issue.

**National Wildlife  
Refuge Association**

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) regarding the proposed road and land exchange in the Izembek NWR. I stand with the National Wildlife Refuge Association in my opposition to the proposal because it is unnecessary and will result in irreparable impacts to the refuge and its designated Wilderness.

A previous EIS completed in 2003 found that a road would be devastating to the refuge. That EIS evaluated the road as a "no option alternative" when determining which transportation tool would be best to enable medical evacuations from King Cove to Cold Bay and the science presented just a few short years ago showed the impacts from a road would be devastating. The "no action alternative" should be adopted in the current final EIS.

As your agency issues a final EIS, I urge you to evaluate the impact to refuges nationwide by de-designation of a Wilderness for a land exchange. The road would be the first ever to bisect a congressionally-designated Wilderness, the highest level of protection that can be bestowed by the United States. The precedent opens the door for other Wilderness areas to be destroyed - not only on Refuges, but National Parks, Forests and other federal lands.

A road through Wilderness is not compatible with the purposes for which the refuge was created - to conserve fish and wildlife populations and their habitats; to fulfill the United States' international treaty obligations (such as the four migratory bird

Protect the Izembek  
NWR

treaties and the Convention on Wetlands of International Importance); to provide for continued subsistence by local residents; and to ensure water quality and quantity within the Refuge.

Further, this is a solution in search of a problem. The people of King Cove have a proven, reliable hovercraft for medical evacuations bringing people from King Cove to Cold Bay in 20 minutes; a road would take more than 2 hours in good conditions. The Aleutians East Borough has currently halted operation of the hovercraft - despite its amazing success rate - saying that it is too costly to operate. However, they have petitioned the FWS to allow them to transfer the hovercraft to another part of their community where it would provide EXACTLY the same service.

As an American taxpayer, my funds have already been spent providing a reliable transportation solution to the people of King Cove and I urge you to select the No Action Alternative in your Final EIS.

The wildlife values of the Izembek National Wildlife Refuge are globally significant and should not be compromised and no more American taxpayer dollars should be spent on this boondoggle proposal.

For the reasons stated above, I stand with the National Wildlife Refuge Association in urging you to please adopt the no action alternative.

**Wilderness Watch  
(note these were  
each submitted  
differently but  
need to be coded  
to same themes.  
Submissions are in  
the unique CASy –  
not in the form  
letter bin)**

- Wilderness must remain permanently protected and never bartered away for political or other purposes.
- The proposed road would damage forever one of the world's most vital habitats for internationally significant wildlife.
- Lands that this scheme proposes to add to the refuge Wilderness are of lower quality and fail to compensate for the unique values that would be lost.
- The health and safety concerns expressed by King Cove residents were fully addressed by Congress in

**Support the No Action  
Alternative**

1999 and there is no justification for road building in the Wilderness.

- **The costs for construction and maintenance of this** road are not justified economically, even if there were no environmental impacts.

## **APPENDIX G-3**

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### **SAMPLE COMMENT LETTERS**

**G. Examples from brief, non-substantive comments, typically submitted as e-mail messages**

**Examples from brief, non-substantive comments, typically submitted as e-mail messages**

Please, please, no roads within wilderness areas

Please do not consider allowing any new development in Alaska's pristine wilderness! Thank you.

Will the destruction of our wild lands, plants & animals ever stop? Will you continue until it is all gone? I say it should stop NOW!!!! You should be adding to it not taking from it. When will mans greed and selfishness stop? Ever??

This is a terrible project to move forward. Please do not destroy this valuable land and endanger the inhabitants, animal and human. Please go away and leave this area alone.

You're crazy! (I'm being polite!) Wilderness? with roads? I suppose next you'll want to build a supermarket and then make the road a high-speed highway. Stop NOW!

LET NO ROAD RUN THROUGH THE IZEMBECK WILDERNESS.

LEAVE THE WILDLIFE ALONE - NO ROAD

I support the no action alternative and I hope you do too. Thank you.

Once you build a road thru it, it is forever and always NOT a wilderness. This is not absolutely not necessary.

Please choose the No Action Alternative. A road through the Izembek Wilderness is not acceptable.

I do not agree that us national lands should be traded away or switched. I don't believe this is in the best interests of the usa citizens. national owners of this property say no to this proposal.

Is this another Alaskan road to nowhere?? Why are you doing this? It is so unnecessary.

How would you like your home destroyed, or just plain interrupted! Think of the animals! Think of the human destruction!

We support the no action alternative re: the Izembek Wilderness: This is too valuable a place to ruin

I am sending this email to voice my opinion that Izembek be left in its natural pristine state.

I support the No Action Alternative. Please stop this senseless violation of nature.

WE NEED TO KNOW THAT OUR GOVERNMENT CARES ABOUT US. WE FIRMLY BELIEVE WE ARE THE PUBLIC INTEREST THAT SECRETARY SALAZAR MUST REPECT AND HONOR IN MAKING HIS FINAL DECISION FOR APPROVING THE LAND EXCHANGE AND EITHER ROAD CORRIDOR ALTERATIVE.

Hello, I simply want to add my plea for no further human activity in this beautiful wilderness area. Can we as a species not see that we have more than our share of the earth and should confine our activities to the areas that have already been 'peopled'. A healthy ecosystem must include wilderness in as great a

proportion as possible. There are other beings that we profoundly effect with each further intrusion into pristine areas. Please go to the wilderness and experience it. It is irreplaceable and we can not recreate it once it has been touched by our activities. We must use our ingenuity within confines already established. We must act in the interest of all, not just private human interests - the interests of the few.

The only good alternative regarding the Izembek National Wildlife Refuge are alternatives 4 and 5! This way we can stop a dangerous precedent that would allow land to be removed from an existing refuge and allow a road to be constructed there! The possibility of a road is threat to wilderness system! Keep in mind that the entire world's population of black brant nest at the refuge! I support either hovercraft to the Lenard Harbor ferry with dock improvements.

I have acquainted myself with the issues involved with the Izembek National Wildlife Refuge Land Exchange and proposed Road Corridor and have decided that the only Alternatives that make sense to me and that I would consider to be in the public interest are Alternatives 1 and 4.

'IF YOU BUILD IT, THEY WILL COME...', hoards ad hoards of not wildlife, but people. Soon it will look like everywhere else--a concrete desert and too many people.

I support which ever route that has the best road bed conditions, requires the least amount of fill & culverts, and that can provide the most solid base for a good long life road. I believe a well built road on the best road building soils will ultimately require the least upkeep and have the lowest overall environmental impacts to the area. I support which ever road route is most likely to be able to support a two lane all season road. I support building a two lane all season road and allowing use of such road year 'round for all purposes unless it can be shown with scientific proof (peer reviewed) that such use is statistically significantly detrimental to major wildfowl populations.

The Izembek Land Exchange authorized by Congress creates an opportunity to address the urgent public safety needs of an indigenous people and add significant acreage to the nation's publicly owned wetlands and wilderness. The Agdaagux Tribe of King Cove and Belkofski Tribal Council have expressed a preference for either DEIS alternatives 2 or 3. We fully support them and write in favor of selecting either of these alternatives.

Izembek Please leave the Izembek wilderness alone. Do not accelerate the destruction of the natural world. Once you destroy it, it can never be recovered. It's simply gone forever (and the wildlife with it). I'm in favor of the no action alternative. We MUST NOT systematically destroy our remaining wilderness. We MUST protect it. Please do no harm.

A road is our only reasonable alternative for this community.

As a commercial fishermen in this area since 1992, it well overdue that some solution for the people of King Cove, AK to have a practical way to access the airport in Cold Bay. There are numerous reason way it is necessary to resolve this dilemma. Whatever this solution is going to come by the decision making in Washington D.C. it is vitally important for you to put yourself in same position as the resident of this

U.S. Department of Interior  
U.S. Fish & Wildlife Service

<http://www.fws.gov>  
<http://izembek.fws.gov/eis.htm>

Federal Relay  
1 800/877 8339 Voice and TTY

**February 2013**

