Appendix I  Correspondence Concerning the No Action Alternative
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

On the Cover: Izembek National Wildlife Refuge, 2007
Photo from the NCTC Image Library
APPENDIX I

Correspondence Related to the No Action Alternative
## TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Date</th>
<th>Correspondence Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 15, 2011</td>
<td>Aleutians East Borough letter to the U.S. Fish and Wildlife Service</td>
</tr>
<tr>
<td>December 14, 2011</td>
<td>U.S. Fish and Wildlife Service letter to Aleutians East Borough</td>
</tr>
<tr>
<td>February 24, 2012</td>
<td>Aleutians East Borough letter to the U.S. Army Corps of Engineers</td>
</tr>
<tr>
<td>March 20, 2012</td>
<td>The U.S. Army Corps of Engineers letter to Aleutians East Borough</td>
</tr>
<tr>
<td>March 29, 2012</td>
<td>Aleutians East Borough letter to the U.S. Fish and Wildlife Service</td>
</tr>
<tr>
<td>April 18, 2012</td>
<td>The U.S. Fish and Wildlife Service letter to Aleutians East Borough</td>
</tr>
<tr>
<td>July 9, 2012</td>
<td>Aleutians East Borough letter to the U.S. Fish and Wildlife Service</td>
</tr>
</tbody>
</table>
November 15, 2011

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

Dear Stephanie,

After another detailed analysis of the financial costs of the Borough’s hovercraft, we have concluded it is not financially feasible or responsible to authorize the re-start of King Cove – Cold Bay hovercraft operations. For more than three years the hovercraft was in operation, it required an annual operating subsidy in excess of $1 million from the Borough’s general fund. This amount of annual funding is not sustainable or realistic for a remote, regional local government consisting of six communities with a population of 2500.

As the Borough’s Mayor, I have the responsibility to direct my staff to be fiscally conservative, equitable, and realistic. Please know I accept this responsibility as my primary commitment to all Borough residents. This commitment further reinforces my decision that the Borough cannot afford to operate the hovercraft.

In response to the above statements, I recommend you immediately direct your Izembek Land Exchange EIS consultant team to amend Alternative 1 (No Action) in the PDEIS to document there will be no resumption of hovercraft service in the foreseeable future. Next, the draft newsletter should also be changed to reflect this amendment.

I apologize for the timing of this information. However, as I understand the current EIS schedule, this information is being provided to USFWS at least two weeks prior to the PDEIS being released for the Cooperating Agencies to review and over two months before the DEIS is expected to be released to the public.

Please contact Borough Administrator, Sharon Boyette, or me if you wish to further discuss this information and recommendations.

Sincerely,

Stanley MacK  
Mayor

Cc: Gary Hennigh, King Cove City Manager
United States Department of the Interior

FISH AND WILDLIFE SERVICE
1011 E. Tudor Road
Anchorage, Alaska 99503-6199

DEC 14 2011

IN REFERENCE TO
NWR 712151

Stanley Mack, Mayor
Aleutians East Borough
3380 C Street, Suite 205
Anchorage, Alaska 99503

Re: No Action Alternative for Izembek National Wildlife Refuge Land Exchange/Road Corridor Environmental Impact Statement (EIS)

Dear Mayor Mack:

Thank you for your recent letter to inform us the Aleutians East Borough will not operate the hovercraft in the foreseeable future. As we have indicated, the Draft EIS will be published with the No Action Alternative including hovercraft operation from the Northeast Hovercraft Terminal starting in April 2013. However, we will indicate your recent decision in cover materials and that there will be changes for the Final EIS.

For the EIS analysis to be accurate, we need to know the following information:

1. What is the status of the road being constructed to the northeast corner of Cold Bay? Will that road remain permitted and funded for construction to proceed without plans for operating a hovercraft from the northeast corner? When is the road estimated to be completed? Who will be maintaining the road?

2. What is planned for the hovercraft and hovercraft facilities? Will a facility be built in the northeast corner, without a hovercraft operating? What about the disposition of the hovercraft and all related facilities at Lenard Harbor and Cross Wind Cove?

3. Are there other changes we should make in the No Action Alternative to accurately reflect relevant activities of the Aleutians East Borough?

Thank you for your attention to these outstanding issues and we are looking forward to hearing from you soon.

Sincerely,

Helen Clough, Chief
Division of Conservation Planning & Policy
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,

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
Regulatory Division
POA-2000-300-M3

Honorable Stanley Mack
Mayor of Aleutians East Borough
3380 C Street, Suite 205
Anchorage, Alaska 99503

Dear Mayor Mack:

This letter is in regard to your February 24, 2012, letter providing information on the proposed purpose and use for the road and hovercraft terminals authorized by Department of the Army (DA) permit number POA-2000-300-M3, Cold Bay. The project purpose identified during that DA permit evaluation was to facilitate operation of a hovercraft between King Cove and Cold Bay. Your letter states that the Aleutians East Borough (AEB) will no longer operate the hovercraft between these communities due the cost. Accordingly, the Corps of Engineers requested that AEB provide a revised project purpose for our evaluation into whether the permit may need to be modified, suspended, or revoked.

In the absence of hovercraft use, the AEB plans instead, to use an aluminum landing craft/passenger ferry that would be modified to allow the vessel to use the landing pads at the northeast corner and at Cold Bay. Based upon this information, we have determined the proposed landing craft/passenger ferry meets the purpose and need of the permit.

Please contact us if you decide to alter the method, scope, or location of your proposed activity. Nothing in this letter excuses you from compliance with other Federal, State, or local statutes, ordinances, or regulations.

For additional information, please contact Ms. Heather Boyer, of my Regulatory Division staff, via email at Heather.L.Boyer@usace.army.mil, by mail at the address above, by phone at (907) 753-2877, or toll free from within Alaska at (800) 478-2712.

Sincerely,

Terri Stinnett-Herczeg
Deputy Chief, Regulatory Division

March 29, 2012

Helen Clough  
U.S. Fish and Wildlife Service  
1011 East Tudor Road  
Anchorage, AK 99503-6199  

Dear Helen,

Mayor Mack received a letter from you dated December 14, 2011 with several questions related to the No-Action Alternative to the Land Exchange/Road Corridor EIS. I would like to apologize for the length of time it has taken us to get answers to your questions. I can now respond to your letter.

You asked about the road to the Northeast Corner project. The road project led by the Alaska Department of Transportation is continuing with construction of the road. The related facilities, under construction this season, may have some minor changes. The project’s permits and funding remain unchanged. It is scheduled for completion in September 2012.

As you can read in the attached letters between the Borough and the Army Corps of Engineers, our plan is to use the road to the northeast corner as a section of the road between King Cove and the Cold Bay Airport, if the land exchange and road corridor are approved and the road built from the northeast corner to Cold Bay.

You asked about the disposition of the hovercraft owned by the Borough. It will be moved to another federal project, presently under construction, the Akutan Airport. It will provide the marine link between the Akutan village on Akutan Island and their new airport on Akun Island by September 1, 2012. It will not be available under the No-Action Alternative nor under the Hovercraft Alternative.
I believe this answers your questions related to the No-Action Alternative.

Sincerely,

Sharon Boyette
Administrator

Enclosures: AEB letter to Kevin Morgan, U.S. Army Corps of Engineers
Corps letter to Mayor Mack
Honorable Stanley Mack, Mayor
Aleutians East Borough
3380 C Street, Suite 205
Anchorage, Alaska 99503

Re: No Action Alternative for the Izembek National Wildlife Refuge (NWR)
Land Exchange/Road Corridor Environmental Impact Statement (EIS)

Dear Mayor Mack:

Thank you for your letter dated March 29, 2012, informing us of the Borough’s decision to relocate the hovercraft (that was purchased to provide a marine line between King Cove and Cold Bay under the 2003 King Cove Access Project) to Akutan and its plan to develop an alternative transportation link between King Cove and Cold Bay. As an alternative to the hovercraft, we understand the Borough is proposing a 59 foot aluminum landing craft/passenger ferry. After reviewing your letter, we have additional questions related to that alternative means of transportation. The information is needed to update the No Action Alternative in the Izembek NWR Land Exchange/Road Corridor EIS. The No Action Alternative must describe what would occur if the U.S. Fish and Wildlife Service takes no action in this EIS. Thus, information needed on the current status and the future actions planned to implement the 2003 EIS includes:

1) Where will the landing craft/passenger ferry be stored or moored when it is not transporting people to and from King Cove to Cold Bay? Will it be moored at the Cold Bay dock, in the harbor at King Cove, or at an alternate location that would require construction?

2) Will the footprint change at the proposed hovercraft landing location at the Northeast Terminal or at Cross Wind Cove?

3) What are the vessel specifications (including vehicle and passenger loads) and the estimated operability limits of the landing craft/passenger ferry?

4) What are the estimated costs to purchase and operate the landing craft/passenger ferry? What is the estimated frequency or level of service to be provided at these costs?

5) What is the proposed timeline for purchasing and implementing the ferry, under a No Action Alternative for this EIS?
We appreciate your time and attention to this important issue. We will need your response no later than June 30, 2012, to coincide with the conclusion of the comment analysis phase and development of the Final EIS. If we do not receive a response from you by this date, we will make assumptions based on similar ferries used elsewhere in Alaska.

Sincerely,

Helen Clough, Chief
Division of Conservation Planning and Policy
July 9, 2012

Helen Clough, Chief
Division of Conservation Planning and Policy
US Fish and Wildlife Service
1011 E. Tudor Rd.
Anchorage, Alaska 99503-6199

Dear Helen:

This letter will respond to your letter of April 18, 2012. The letter asked a number of questions regarding a conceptual “landing craft/passenger ferry.” As you know, this concept was included in a letter the Aleutians East Borough (AEB) recently sent to the Army Corps of Engineers. This letter mentioned the “landing craft/passenger ferry.”

The best information the Borough can provide is that which is contained in the Feb. 24, 2012 letter to Kevin Morgan which the Borough has provided you and which apparently generated your April 18 letter. At this time, the AEB can provide no further information on this potential project which remains in early consideration by the AEB.

Having said this, I will attempt to answer each of your questions as best I can.

1. **Where will the craft be docked or moored when not in use?** AEB cannot answer this question other than the information provided in the letter to Kevin Morgan.

2. **Will the footprint change?** AEB cannot answer this question as these issues will be part of the evaluation if the Secretary does not approve the land exchange.

3. **What are the vessel specifications/operability limits?** AEB cannot answer this question other than the information provided in the letter to Kevin Morgan.

4. **What are the costs to operate?** AEB cannot answer this question at this time, but past experience with the hovercraft has shown that AEB costs always exceed study estimates.

5. **What is the timeline for the conceptual landing craft/passenger ferry under a No Action decision?** As stated in my letter to Kevin Morgan, it is the fervent hope of the AEB that the Secretary will approve the land exchange. This approval is clearly in the public interest and would eliminate any consideration by the AEB of any other alternative. The AEB cannot provide any timeline.

The AEB will continue to work with you and your team to conclude the EIS process and hopes for approval of the Izembek Land Exchange by Secretary Salazar.

Sincerely,

Stanley Mack, Mayor