

U.S. Fish and Wildlife Service  
Izembek National Wildlife Refuge, Alaska  
Proposed Land Exchange/Road Corridor  
Environmental Impact Statement

## Scoping Report

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## List of Acronyms

Act	Omnibus Public Lands Management Act of 2009
ANILCA	Alaska National Interest Lands Conservation Act
EIS	Environmental Impact Statement
NEPA	National Environmental Policy Act
Service	U.S. Fish and Wildlife Service
SOCs	Statements of Concern
Tribe	Agdaagux Tribe of King Cove

## 1.0 Introduction

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The U.S. Fish and Wildlife Service (Service) is the lead federal agency preparing an environmental impact statement (EIS) for a proposed land exchange and the potential construction and operation of a road between the communities of King Cove and Cold Bay, Alaska. Lands owned by the State of Alaska and lands owned by the King Cove Corporation would be exchanged for federal lands within the Izembek Wilderness, Izembek National Wildlife Refuge, and lands within the Alaska Maritime National Wildlife Refuge on Sitkinak Island. Refer to Section 1.2 for a more detailed description of the proposed project.

Cooperating Agencies for the project include:

- U.S. Army Corps of Engineers
- Alaska Department of Natural Resources, coordinating for the State of Alaska agencies
- Agdaagux Tribe of King Cove (Tribe)
- Alaska Migratory Bird Co-Management Council
- Aleutians East Borough
- City of King Cove
- King Cove Corporation.

In addition, the Western Federal Lands Highway Program of the Federal Highway Administration may also become a cooperating agency for the project.

The Service published a Notice of Intent in the Federal Register on August 6, 2009 to announce the preparation of an EIS. A Revised Notice was published on February 24, 2010 to announce the public scoping meeting dates, inviting suggestions on the scope of issues to be addressed in this EIS along with dates, times, and locations of upcoming public meetings. A project newsletter was sent by the Service in January 2010 to the project mailing list that explained the National Environmental Policy Act (NEPA) and the EIS process and how to participate in the project.

The Service has completed the formal scoping process; the scoping period closed on April 30, 2010. Comments received through May 21, 2010 are summarized and presented in this document. Comments received later will be considered during the development of the EIS, but are not part of this report. This document is a public record of the scoping activities conducted for the Izembek National Wildlife Refuge Land Exchange/Road Corridor EIS.

A series of appendices compile the supporting materials for the summaries provided in this report. Materials regarding public notice and outreach, meeting materials, and the Comment Analysis Report are provided in the appendices.

### 1.1 Scoping Overview

The Service hosted scoping meetings in Washington, DC; Anchorage, Cold Bay, False Pass, King Cove, Nelson Lagoon and Sand Point, Alaska during March and April, 2010. Details on the locations and times can be found in Table 1 and a link to the scoping meeting transcripts and notes can be found on the project website: <http://izembek.fws.gov/eis.htm>

**Table 1: Scoping Meetings, Locations and Dates**

Location	Date	Time & Place
Anchorage, Alaska	March 4, 2010	5 pm Wilda Marston Theatre, Loussac Library
Washington, DC	March 11, 2010	1 pm Sydney R. Yates Auditorium
Sand Point, Alaska	April 26, 2010	4 pm City Chamber Room
Cold Bay, Alaska	April 27, 2010	7 pm Cold Bay Community Center
Nelson Lagoon, Alaska	April 28, 2010	1 pm Nelson Lagoon Community Center
False Pass, Alaska	April 28, 2010	3 pm False Pass Community Center
King Cove, Alaska	April 29, 2010	3 pm King Cove Multi-purpose Building

## 1.2 Project Description

In response to direction provided in the Omnibus Public Land Management Act of 2009 (the Act), an EIS is being developed for a proposed land exchange “for the purpose of constructing a single lane gravel road between the communities of King Cove and Cold Bay, Alaska.” The Act further states the road “shall be used primarily for health and safety purposes (including access to and from the cold Bay Airport)” and the road would be used for noncommercial purposes (with the exception of taxis and public transportation.)

In accord with the provisions of the Act, the Service proposes to exchange:

- approximately 206 acres within the Izembek Wilderness and Izembek National Wildlife Refuge and
- approximately 1,600 acres of Federal land within the Alaska Maritime National Wildlife Refuge on Sitkinak Island.

These approximately 1,806 acres of land would be removed from Federal ownership and the title vested in the State of Alaska. In return, the Service would receive approximately 43,000 acres of lands owned by the State of Alaska and approximately 13,000 acres owned by the King Cove Corporation. If the land exchange is approved, an estimated 43,000 acres of land that is transferred to the Service would become wilderness.

In addition, the land exchange would require King Cove Corporation to relinquish land selections totaling about 5,430 acres in the Izembek NWR in the vicinity of the northeast corner of Cold Bay. Thus, King Cove Corporation would forego approximately 18,430 acres of land currently owned and valid selections in return for the single lane gravel road on lands that would be owned by the state.

In accord with Section 6402(b)(2)(B) of the Act, the EIS will analyze the impacts of the proposed land exchange and the potential construction and operation of a single lane gravel road between the communities of King Cove and Cold Bay, Alaska. A specific road corridor and a reasonable range of alternatives will be identified for analysis. As identified in the Act, the State of Alaska, Aleutians East Borough, City of King Cove, and the Tribe, and the Alaska Migratory Bird Co-Management Council would be involved in the identification of the proposed road corridor. In

addition, federal agencies with permitting jurisdiction would be involved in the identification of the road corridor to be evaluated and the range of alternatives. The U.S. Army Corps of Engineers is a Cooperating Agency. The Western Federal Lands Highway Division of Federal Highway Administration is considering becoming a Cooperating Agency.

Two Notices of Intent were published in the *Federal Register*; one notice was published in August 2009 to announce the preparation of the EIS and a revised notice was published in February 2010 to announce the public scoping meetings. The Service has completed the formal scoping process.

The EIS will include a technical study to address preliminary conceptual engineering for the proposed road corridor. Preliminary design features to be considered in the EIS will be evaluated by the Service and Cooperating Agencies in accord with the provisions of the Act and the respective regulatory authorities of the Cooperating Agencies. The EIS will include a functional values assessment of the entire land exchange – providing a comparison of ecological integrity or values of the separate parcels. Additional design and environmental features will be developed as additional phases of the project are initiated by the permit applicant(s).

Preliminary alternatives that have been identified to date are:

Alternative A – No Action. No land exchange or new road construction would take place. An estimated 56,000 acres of state and King Cove Corporation land would not be added to the Izembek NWR. No lands would be removed from Federal ownership. The estimated 5,430 acres of valid King Cove Corporation selections within the Izembek Wilderness could be transferred to King Cove Corporation ownership. Existing conditions would be maintained.

Alternative B – Proposed Action. As outlined in the Act, the land exchange would take place for the purpose of constructing and operating a single land gravel road between the communities of King Cove and Cold Bay, Alaska.

Additional alternatives will be considered, based on scoping comments, the regulatory requirements of the federal agencies with permitting jurisdiction, and input from the Cooperating Agencies.

The EIS will identify and disclose direct, indirect, and cumulative impacts for all resource issues by alternative, including access to and use of subsistence resources and other scoping issues selected for detailed evaluation. The proposed land exchange involving lands within Alaska Maritime, Alaska Peninsula, and Izembek National Wildlife Refuges will be evaluated as will the construction and operation of the specific road corridor through the Izembek Wilderness within Izembek National Wildlife Refuge and any subsequent alternatives based on information from the Cooperating Agencies, stakeholders, and public comments.

### **1.3 History of the Project and Public Involvement**

The cities of King Cove and Cold Bay are located at the western end of the Alaska Peninsula, approximately 625 miles southwest of Anchorage. Both are located on the Pacific Ocean side of the peninsula. The Cold Bay Airport has one of the longest civilian runways in Alaska at 10,415 feet, and the only crosswind runway in the region. The King Cove Airport has a 3,500 foot gravel runway and is restricted to small aircraft operating under visual flight rules. Residents of King Cove feel that safe and reliable access to the Cold Bay Airport is essential.

In 1999, Congress passed the King Cove Health and Safety Act (Section 353) of the Omnibus Consolidated and Emergency Supplemental Appropriations Act (Public Law 105-277) which provided the Aleutians East Borough with funds to construct a year-round marine-road

transportation system between the cities of King Cove and Cold Bay, Alaska. This King Cove Health and Safety Act also appropriated funding for improvements to the King Cove medical clinic and airport. The U.S. Army Corps of Engineers was the lead federal agency, and the Service was a cooperating agency in this effort. The two agencies determined that an EIS was required for the King Cove Access Project. A road corridor through Izembek Wilderness and Izembek National Wildlife Refuge was discussed and analyzed, but was included in the 2003 EIS for comparison purposes only due to a legislative mandate that authorized a marine transportation system.

The Notice of Availability of the Draft EIS was published in the *Federal Register* on August 8, 2003 that examined six alternatives for access between King Cove and Cold Bay, Alaska. An alternative was selected that provided a hovercraft connection between the two communities. Approximately 11,800 people provided electronic comments during scoping; they were notified by email that the Draft EIS and Appendices were available on the project website.

The U.S. Army Corps of Engineers provided formal written notice to 310 local, state, federal and Native entities, conservation and business organizations, news media, and individuals. Approximately 200 copies of the Draft EIS in hard copy and electronic format were distributed. Approximately 6,343 organizations and individuals provided comments on the Draft EIS by the close of the comment period on September 23, 2003. Approximately 96 percent of all submissions were form letters. Public hearings were held in Cold Bay, King Cove, and Anchorage.

Resulting from the 2003 EIS, the Aleutians East Borough has operated a commercial hovercraft service between the communities of King Cove and Cold Bay since August 2006. Due to high operating costs, the hovercraft schedule has been limited to three days per week, rather than the original intent of daily service.

As previously stated, in 2009 Congress directed the Secretary of the Interior to prepare an EIS that includes an analysis of a proposed land exchange with the Service, the State of Alaska and the King Cove Corporation “for the purpose of constructing a single lane gravel road between the communities of King Cove and Cold Bay, Alaska.” The Act further states the road “shall be used primarily for health and safety purposes (including access to and from the Cold Bay Airport)” and the road would be used for noncommercial purposes (with the exception of taxis and public transportation.). As a condition of the land exchange, the Secretary of the Interior must determine that the land exchange and the road corridor are in the public interest.

The Service published a notice in the *Federal Register* on August 6, 2009, inviting suggestions on the scope of issues to be addressed in this EIS. A project newsletter was sent by the Service in January 2010 to the project mailing list that explained the NEPA process and how to get involved. The Notice of Intent was published on February 24, 2010 announcing the scoping period end date (May 1, 2010), along with dates, times, and locations of upcoming public meetings. Scoping meetings were held in Anchorage, Washington DC, Cold Bay, False Pass, King Cove, Nelson Lagoon and Sand Point during March and April, 2010.



## 2.0 Scoping Mechanisms

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The following section describes the mechanisms used to solicit and capture public comment in accordance to Council on Environmental Quality guidance (40 CFR 1501.7).

### 2.1 Scoping Announcements and Newsletters

#### General Public Notification

As described in Section 1.1, the Service published the Notice of Intent in the *Federal Register* on August 6, 2009 and a Revised Notice on February 24, 2010 to announce the public scoping meeting dates and invite comment about issues to be addressed in this EIS. Both can be found in Appendix A.

Several public notification techniques were used to notify the public of the proposed EIS project and scheduled public meetings in order to solicit public comment. Advertisements placed in the *Anchorage Daily News* ran February 27–March 4, 2010; for a copy of the advertisement, see Appendix A. An announcement for the Anchorage scoping meeting was broadcast on KSKA public radio. The Service also distributed public notices via press release, email, website, flyers, and the newsletter; samples of the notices are available in Appendix A.

In addition to the notifications provided by the Service, cooperating agencies and individuals posted notifications of the scoping meetings and EIS process. The Service provided a scoping announcement to cooperating agencies for website posting, which was adapted by the Aleutians East Borough and the communities. In addition, the Aleutians East Borough provided verbal notifications and postings in the affected communities of the borough. Private individuals also have posted information about the project, such as <http://izembekeis.info> (Appendix A). Non-governmental organizations were also active in notifying constituents of the project and the EIS process.

#### Agency Coordination and Consultation

The Service began an informal consultation process to assist and promote coordination with cooperating agencies and regulatory or permitting agencies. These agencies include:

- Federal Highway Administration (Western Federal Lands)
- U.S. Army Corps of Engineers
- State of Alaska
  - Alaska Department of Fish and Game
  - Alaska Department of Natural Resources
  - Alaska Department of Environmental Conservation
  - Alaska Department of Transportation and Public Facilities
- Aleutians East Borough – Coastal Zone Management Consistency Determination

Formal consultation is being initiated with agencies having jurisdiction within the project study area regarding resources potentially affected. Preliminary consultation strategy letters were sent to these agencies to initiate that process. These agencies include:

- National Oceanic and Atmospheric Administration, National Marine Fisheries Service (Section 7 Endangered Species and Essential Fish Habitat)
- U.S. Fish and Wildlife Service (Section 7 Endangered Species )
- State Historic Preservation Office (Section 106, National Historic Preservation Act)

Alaska Native Tribal Government Notification and Consultation

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 (Table 2). On March 2, 2010, the Agdaagux Tribe of King Cove indicated that President Etta Kuzakin and Della Trumble are representatives for the tribe during the EIS process.

Letters were sent to the Federally Recognized Tribes on June 16, 2010 stating that public scoping recently occurred and the Service would be glad 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 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. In addition, President Etta Kuzakin and Della Trumble from the Agdaagux Tribe of King Cove and President Simeon Kuzakin from the Native Village of Belkofski provided oral comments at the King Cove public scoping meeting.

**Table 2: List of Federally Recognized Tribes Engaged in the Government to Government Consultation Process**

Etta Kuzakin, President and Della Trumble	Agdaagux Tribe of King Cove
Simeon Kuzakin, President	Native Village of Belkofski
Roy Atchak, President	Chevak Native Village
Ruth Hoblet, President	Native Village of False Pass
David Bunyan, President	Native Village of Hooper Bay
Paul Gundersen, President	Native Village of Nelson Lagoon
Moses Carl, President	Newtok Village
Frank Napoleon, President	Native Village of Paimiut
Amber Karlsen, President	Pauloff Harbor Village

Frank Aguchak, President	Native Village of Scammon Bay
David Osterback, President	Qagan Tayagungin Tribe of Sand Point Village
John Foster, President	Native Village of Unga

## Newsletters

The first project newsletter was mailed in January 2010 providing a basic introduction to the project, schedule, and opportunities to comment during scoping. The newsletters were sent to the mailing list including individuals, agencies, businesses, interest groups and elected and appointed officials. The newsletter provided notification of the scoping meetings and opportunities for public participation. The project website address was included in the newsletter, which had a link for scoping comment submissions.

## Project Website

The project website (<http://izembek.fws.gov/eis.htm>) was launched in January 2010. It includes project information, such as *Federal Register* notices, the scoping meeting presentation, scoping meeting transcripts and notes, newsletters, fact sheets, and press releases. The website includes a mailing address for submitting comments, [izembek\\_eis@fws.gov](mailto:izembek_eis@fws.gov); many scoping comments were submitted electronically. Project documents, as they are developed, will continue to be posted on the website as the project progresses.

## **2.2 Public Scoping Meetings**

Seven public scoping meetings were conducted in March and April 2010 with the dates and locations detailed in Table 1. The scoping meeting format and the information presented was the same at each public meeting.

During the open house session, attendees had the opportunity to view maps that displayed project information and were able to ask questions of the project team. During the presentation portion of the meeting, a PowerPoint presentation was given that included an introduction to the Act, an introduction to the NEPA process and schedule, a description of the proposed land exchange, list of the cooperating agencies, and background on Izembek Wilderness area and its resources as well as information about the cities of Cold Bay and King Cove.

The public question and comment period followed with public testimony. A court reporter recorded public testimony at the meetings in Anchorage, Alaska and Washington, DC. The Service took notes of public testimony and accepted written comments and testimony during the meetings in Cold Bay, False Pass, King Cove, Nelson Lagoon, and Sand Point, Alaska. Comment forms were available at all public meetings so that attendees could submit written comments during the meeting or mail them in at a later date.

The public scoping meeting held in Anchorage had approximately 80 people in attendance with 18 people providing oral testimony. Approximately 30 people attended the meeting in Washington DC with 14 people giving oral testimony. These meetings were held as scheduled in March 2010.

The Service hosted five scoping meetings in the communities surrounding the refuge in late April 2010. The first community meeting was held on April 26 in Sand Point with approximately 15 people in attendance. Of these, 10 people presented oral testimony. The Cold Bay community meeting was held on the following evening with approximately 40 people in attendance, eight of which presented oral testimony. Nelson Lagoon community meeting was held on April 28; attendance was approximately ten people, of which seven provided oral testimony.

Due to impending weather conditions, the Service, with the advice of the City of King Cove and Aleutians East Borough, moved the community meeting for King Cove from Friday, April 30 to Thursday, April 29. Therefore, the community meeting at False Pass was tentatively moved to

Wednesday April 28 in the afternoon, weather dependent. After the Nelson Lagoon meeting, Service personnel flew to False Pass for the scoping meeting. Three people attended the meeting with two people giving oral testimony. Approximately 80 people attended the King Cove scoping meeting on April 29, of which 28 spoke.

Supporting information for the public scoping meetings, including the scoping power point presentation, maps, sign-in sheets, and a sample comment form is included in Appendix B.

## 3.0 Summary of Comments Received

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Public scoping comments were received via:

- Oral discussion or testimony at the public scoping meetings.
- Written comments received by mail, email, or fax.

There were a total of 31,568 submissions submitted during the scoping period. A submission is the entirety of a written or oral entry. A total of 31,454 form letters were received from four different sources (Defenders of Wildlife, The Wilderness Society, Audubon, and National Wildlife Refuge Association). There were 114 unique submissions.

Comments are discrete concepts conveyed in submissions. Comments were assigned subject category codes to describe the content of the comment. The issue categories and codes are listed in Table 3. The issues were grouped by general topics, including effects, purpose and need, proposed action and alternatives, and regulatory compliance. The relative distribution of comments by issue is shown in Figure 1, which displays the analysis of unique comments, which includes one of each form letter.

Group affiliations of those that submitted comments included: federal agencies, Tribal governments, state agencies, local governments, businesses, special interest groups/non-governmental organizations, and individuals. The complete text of public comments received is included in the Administrative Record for the EIS.

All unique submissions were read and analyzed for substantive comments. Substantive comments were assigned a single *Issue Code* in the Comment Analysis System database. Each comment coded also received an automatic tracking number (Comment ID) by the Comment Analysis System database.

The public comment submissions generated 640 coded comments, which were then grouped into *Statements of Concern* (SOCs). SOCs are summary statements intended to capture the different themes identified in the substantive comments. Every substantive comment was assigned to an SOC; 149 SOCs were developed. Each SOC is represented by an issue category code followed by a number: the Service will use the SOCs to develop alternatives and mitigation measures in the EIS, as appropriate.

### 3.1 Issues Identified

The comments received during the scoping period were coded into 28 issue categories, described as follows:

**Table 3 - Issue Category Codes**

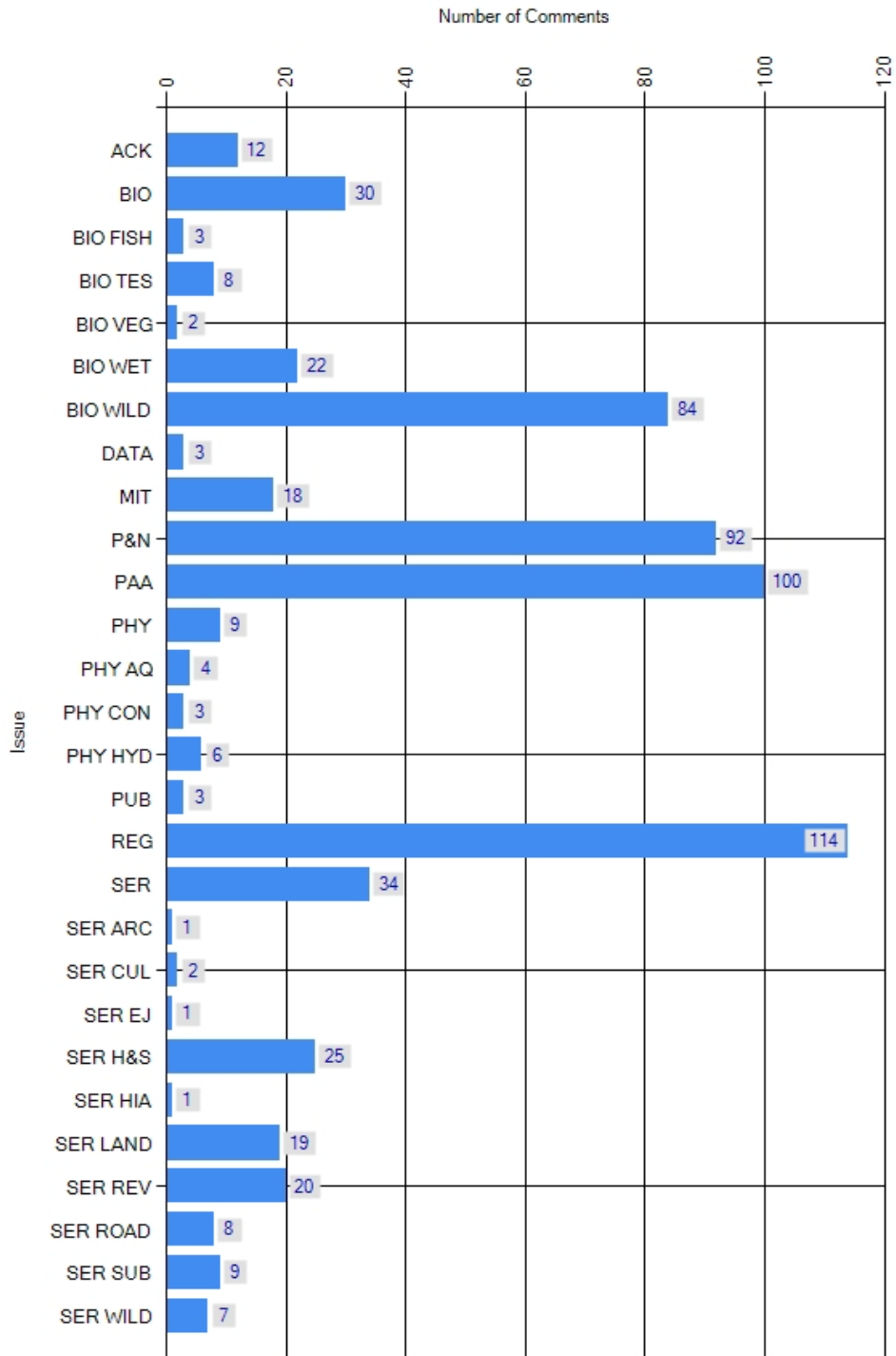
Group	Issue Category	Issue Code	Issue Summary
Regulatory Compliance	Federal/State Permits, Approvals, Laws, Regulations, and Policies	REG	Comments related to past legislation, compliance with regulations, and the purpose/mission of wilderness and refuge areas, and the equity of the land exchange.
	Public Involvement and Scoping Process	PUB	Comments on compliance with the NEPA process for public scoping.
Purpose and Need	Purpose and Need of the Action	P&N	Comments on the construction of the purpose and need of the project; including the health and safety of the people, and the transportation that is currently in place.
Proposed Action, Alternatives, and Mitigation Measures	Proposed Action and Alternatives	PAA	Comments on the proposed alternatives (including "no action") and their practicality/feasibility, as well as other alternatives to consider.
	Mitigation Measures	MIT	Suggested measures to reduce the impact of the proposed action and alternatives.
Affected Environment: Comments about each resource Environmental consequences: potential direct, indirect and cumulative impacts.	Biological Resources - General	BIO	General comments regarding impacts of the road on fish, wildlife, waterfowl and their habitat.
	Biological Resources - Fish	BIO FISH	Comments about the impacts to essential fish habitat and salmonids.
	Biological Resources - Threatened & Endangered Species	BIO TES	Comments about the impacts to threatened and endangered species in the project area.
	Biological Resources - Vegetation	BIO VEG	Comments regarding impacts to vegetation from construction of road stream crossings (e.g. siltation and erosion).
	Biological Resources - Wetlands & Aquatic Communities	BIO WET	Comments regarding the impacts to wetland habitat and aquatic species.
	Biological Resources - Wildlife	BIO WILD	Comments about impacts from road construction and operation to terrestrial and marine wildlife including the introduction of invasive species.
	Physical Resources	PHY	General comments on the impacts of the physical road construction compounded with 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.
	Physical Resources - Environmental Contaminants & Ecological Risk Assessment	PHY CON	Comments related to the possible accidental release of hazardous materials and the need for an ecological risk assessment.
	Physical Resources - Hydrology	PHY HYD	Comments about potential hydrological changes from the proposed road construction.

**Table 3 - Issue Category Codes**

Group	Issue Category	Issue Code	Issue Summary
	Socioeconomic Resources	SER	Detailed comments on factors to consider as part of a “cost-benefit analysis”.
	Socioeconomic Resources - Archeological/Cultural Resources	SER ARC	Comments related to impacts to historic properties and cultural resources.
	Socioeconomic Resources - Cultural Values	SER CUL	Comments on how the road may bring cultural changes and that traditional knowledge should be used as part of the analysis.
	Socioeconomic Resources - Environmental Justice	SER EJ	Comments that the impacts should include an environmental justice analysis.
	Socioeconomic Resources - Health and Safety	SER H&S	Comments related to safe travel; perspectives that the current (no action) options are hindering medical care, while the proposed road (action) could cause even more driving-related injury.
	Socioeconomic Resources - Health Impact Assessment	SER HIA	Impacts of the road to rural communities it serves (e.g. disease, drugs, education).
	Socioeconomic Resources - Land Use, Public Use, Recreation, Visual Resources	SER LAND	Comments on the potential change to land use because the road would increase access thereby impacting scenic, wildlife resources.
	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 road construction and operation, as well as the overall impacts to the region’s economy.
	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.
	Socioeconomic Resources - Subsistence	SER SUB	Comments on both the benefits of the road to the communities and the impacts to natural resources and subsistence activities.
Socioeconomic Resources - Wilderness	SER WILD	Comments on the loss of wilderness value to the Izebek National Wildlife Refuge due to the land exchange and proposed road.	
General	Data and Available Information	DATA	Recommended studies and reports for the Service to review.
	Comment Acknowledged	ACK	Submissions without substantive comments and/or duplicate submissions.



**Figure 1 – Comments by Issue**



### 3.2 Summary of Public Comments

All comments received during the public scoping period were assigned to issue categories, as previously discussed, and based on the content of the comment. The summarized comments, grouped by issue, are in the Comment Analysis Report in Appendix C. Table 4 contains a very brief summary of SOCs; it is recommended to review the Comment Analysis Report to understand the range of issues identified during scoping. The most frequently coded topics were related to the proposed action and alternatives, regulatory issues and purpose and need. However, as illustrated in the Comment Analysis Report, a broad set of issues was identified during scoping, including concerns regarding potential impacts to biological resources, particularly wildlife; socioeconomic impacts related to health and safety; and public revenue and fiscal considerations. Several individual submissions included extremely detailed information.

**Table 4 - Summary of Statements of Concern by Issue Category**

Group	Issue Category	Summary of Statements of Concern
Process: NEPA, Permits, this EIS, Consultation and Coordination	Regulatory	There were 19 SOCs generated for REG that are related to a variety of issues including the formation of the Izembek National Wildlife Refuge; Alaska Claims Settlement Act; Direction from Omnibus Public Land Management Act of 2009; Wilderness designation; Wilderness requirements; compliance with NEPA, ESA, and other legislation.
	Public Involvement and Scoping	The 3 SOCs identified for PUB are related to stakeholder engagement and identification; including the desire for local residents to participate in the process by having the opportunity to review and provide comments during the EIS process.
Purpose and Need	Purpose and Need of the Action	The 14 SOCs generated for P&N are divergent. Concern was expressed that there is not a need for the proposed action as the issue of transportation for medical emergencies has been solved by use of the hovercraft. Several SOCs express concern that the hovercraft has not solved the issue of safe and reliable transportation and that a road is the only solution. Other SOCs were developed regarding the need for a clear and concise purpose and need statement as required by NEPA and NEPA compliance.
Proposed Action, Alternatives, and Mitigation Measures	Proposed Action and Alternatives	The 21 SOCs developed for PAA are divergent. Several SOCs express support of the proposed action, while other SOCs support a no action alternative. Additional SOCs suggested the continued use of the hovercraft operation; subsidizing the hovercraft, construction a small boat harbor in Cold Bay to facilitate hovercraft use; improvements to the dock at Cold Bay to support hovercraft operations; selecting the least environmentally damaging practicable alternative; use of a helicopter for medical evacuations; and construction of a hospital at King Cove. SOCs in this category also expressed concern for issues associated with road construction, operations, traffic volumes, and long-term costs of various proposed alternatives.
	Mitigation Measures	The 10 SOCs developed for MIT suggest a variety of mitigation measures for consideration that could be considered including design considerations, and enforceable measures to avoid or minimize impacts of the proposed alternative and road construction.

**Table 4 - Summary of Statements of Concern by Issue Category**

Group	Issue Category	Summary of Statements of Concern
<p>Affected Environment: Comments about each resource Environmental consequences: potential direct, indirect and cumulative impacts.</p>	<p>Biological Resources - General</p>	<p>The 7 SOC's developed for BIO included consideration of impacts to the biological environment from the proposed alternative from construction and long-term impacts of a road and potential impacts to fish, wildlife, waterfowl; fragmentation and loss of habitat; impacts from construction of stream crossings and effects on habitat including eel grass; impacts from vehicle and wildlife collisions; Effects of increased access on wildlife; long-term impacts evaluation and issues that should be evaluated in a cumulative impacts analysis. One SOC suggests and evaluation of the fill required for road construction and associated direct and indirect impacts to ecological values was recommended for analysis.</p>
	<p>Biological Resources - Fish</p>	<p>The 2 SOC's developed for BIO FISH are related to examining impacts to salmon habitat and Essential Fish Habitat and considerations of impacts to spawning and passage as a result of proposed road construction.</p>
	<p>Biological Resources - Threatened &amp; Endangered Species</p>	<p>The 2 SOC's identified for BIO TES encourage the Service to address the potential impact to threatened and endangered terrestrial and marine species and their habitat according to the ESA and MMPA, including appropriate consultations. The EIS should consider particularly impacts to impacts to Steller's eiders, black brant, emperor geese and dunlin.</p>
	<p>Biological Resources - Vegetation</p>	<p>The 1 SOC developed for BIO VEG relates to how road dust could impact adjacent vegetation and habitats (such as the eel grass beds) as well as the existing gravel road network from Cold Bay to the shores of Izembek Lagoon.</p>
	<p>Biological Resources - Wetlands &amp; Aquatic Communities</p>	<p>The 5 SOC's generated for BIO WET are related to how the EIS should evaluate effects on wetlands and aquatic communities from the proposed road as well as the existing gravel road access from Cold Bay. Concern was expressed that this evaluation needs to be in sufficient detail that the U.S. Army Corps of Engineers will be able to make its required findings under a Section 404 application and compliance with other statutes and guidance.</p>
	<p>Biological Resources - Wildlife</p>	<p>The 11 SOC's developed for BIO WILD are varied. Several SOC's express the concern for various impacts to wildlife that could occur as a result of the proposed land exchange and road construction. SOC's for this category are related to species including brown bear, caribou, waterfowl, migratory birds, and marine species. Concern was also expressed regarding the impacts to wildlife from the introduction of invasive species.</p>
	<p>Physical Resources</p>	<p>The 4 SOC's for PHY are related to conducting an analysis of the current and projected impacts to the region from climate change and how these impacts could be confounded by the development of a road; cumulative impacts of the land exchange and proposed road in the context of proposed oil and gas development in and around the lands and waters of the Izembek National Wildlife Refuge and Izembek Lagoon; regional extent and international extent of impacts to the physical resources of the region; and impacts of including road construction, sediment run-off, watershed impacts and pollution.</p>

**Table 4 - Summary of Statements of Concern by Issue Category**

Group	Issue Category	Summary of Statements of Concern
	Physical Resources - Climate & Air Quality	The 2 SOCS developed for PHY AQ are related to climate change; provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS), and criteria pollutant non-attainment areas in the road corridor and surrounding areas; and disclosure of greenhouse gases emitted by the project be included in the EIS.
	Physical Resources - Environmental Contaminants & Ecological Risk Assessment	The 3 SOCs identified for PHY CON express concern for how pollutants from the proposed road could impact the surrounding ecosystem. One SOC details how the EIS should address potential direct, indirect and cumulative impacts of hazardous materials from construction of the project, analyze risks involving possible accidental releases of hazardous materials, and describe mitigation and emergency response measures.
	Physical Resources - Hydrology	The 4 SOCs developed for PHY HYD are related to how the EIS should describe all waterbodies and stream crossings and potential impacts (including specific pollutants) to surface, subsurface, and ground water in the project area.
	Socioeconomic Resources	The 5 SOCs identified as related to SER suggest a cost benefit analysis be conducted; discuss issues with road maintenance; benefits to the local communities from a road; potential impacts of the land transfer; and concerns expressed regarding road siting, location, safety and maintenance.
	Socioeconomic Resources - Archeological/Cultural Resources	This 1 SOC for SER ARC notes that impacts to historic properties and cultural resources should be considered in an orderly and systematic manner, in full consultation with all concerned parties.
	Socioeconomic Resources - Environmental Justice	This 1 SOC for SER EJ describes how the EIS should disclose what efforts were taken to ensure effective public participation and to meet environmental justice requirements consistent with Executive Order 12898.
	Socioeconomic Resources - Health and Safety	The 4 SOCs identified for SER H&S describes the challenges faced by the community for traveling in and out of King Cove during inclement weather. One SOC is in support of the road for health and safety reasons while another SOC expressed concern that a road would not create a safer or more efficient transport and impacts associated with the road could lead to littering, abandoned vehicles, violation of traffic laws; including speeding, and drunk driving.
	Socioeconomic Resources - Health Impact Assessment	The 1 SOC for SER HIA expressed a concern that a road between the two communities may encourage the use of illegal drugs.
	Socioeconomic Resources - Land Use, Public Use, Recreation, Visual Resources	The 9 SOCs for SER LAND are varied. SOCs are related to impacts on recreational activities; increase in legal and non-legal access; compatibility of alternatives with land management objectives; impacts to scenic, wildlife, visual opportunities for solitude and primitive recreation; and existing trail usage.

**Table 4 - Summary of Statements of Concern by Issue Category**

Group	Issue Category	Summary of Statements of Concern
	Socioeconomic Resources - Public Revenue and Fiscal Considerations	The 4 SOC's for SER REV are varied. One SOC expressed concern that the current EIS process is a waste of taxpayer money and that millions of dollars have already been provided to alleviate the problem of safe transportation. One SOC expressed concern as to who would provide funds for year-round maintenance and operation costs of the road. Another SOC describes how the proposed road would be good for the economy and quality of life through jobs (e.g., snow removal) and commerce (e.g., access to gravel, shipping fresh products between the communities). Concern was expressed that the EIS needs to address financial connections between the oil industry seeking leases in Bristol Bay and proponents of the road across the peninsula.
	Socioeconomic Resources - Road Design, Bridges, Transportation, Planning and Transportation Systems (air, water and road)	The 2 SOC's related to SER ROAD are related to the width of the road corridor and how the existing road that runs north of Cold Bay through the Izembek National Wildlife Refuge would be affected by the exchange and how it would be connected.
	Socioeconomic Resources - Subsistence	The 3 SOC's related to SER SUB describe how the EIS should evaluate effects of the land exchange and construction of the proposed road on subsistence in relation to impacts from subsistence use, access, and management. The benefits of the road to the communities of Cold Bay and King Cove need to be evaluated against the impacts to natural resources and the subsistence culture of Alaska and the rest of the west coast. The EIS should gather and analyze traditional knowledge on subsistence use patterns and disclose historical information compiled on subsistence ORV use within the Izembek National Wildlife Refuge.
	Socioeconomic Resources - Wilderness	The 6 SOC's for SER WILD are related to impacts that the proposed land exchange and proposed road could have on the wildlife and wilderness values of the Izembek National Wildlife Refuge and impacts to tourism from loss of wilderness. Concern was expressed that declassification of wilderness will have an effect on wilderness across the nation. A comparative evaluation of wilderness and lands selected for proposed for exchange was recommended.
General	Data and Available Information	The 1 SOC for Data highlights studies, reports and sources of information recommended for review by the Service.
	Comment Acknowledged	The 2 SOC's developed for Comment Acknowledged are for submissions without substantive comments and duplicated comments.

## **4.0 Next Steps in the Planning Process**

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This section is intended to be a very broad overview of the next steps in the NEPA process.

### **4.1 Develop Alternatives**

A reasonable range of alternatives that meet the purpose and need of the project will be identified and examined in the EIS. Pertinent input from the scoping process will be incorporated into the range of potential alternatives. This ensures that the full spectrum of positions expressed by participants in the scoping process has been considered, in accord with NEPA. In addition to the land exchange proposal, at least one road construction alternative will be evaluated, in accord with the Act that is guiding this EIS process. Alternatives that were eliminated from further consideration and not brought forward for formal analysis in the EIS will be identified, along with justifications for elimination.

Each viable alternative will be developed with conceptual plans by using available information or by identifying additional information to be obtained in order to evaluate all of the alternatives on an equal basis. This step begins after the scoping comments are analyzed and the scoping report finalized; this step is scheduled to begin in August 2010.

### **4.2 Describe the Affected Environment**

Available environmental information associated with the identified issue categories will be reviewed and summarized. The summary will include available scientific research and pertinent studies and surveys required for areas that would be potentially impacted by the viable alternatives. This information will be presented in the *Affected Environment* chapter of the EIS. This step is scheduled to begin in August 2010.

### **4.3 Assess Environmental Consequences of Alternatives**

The potential environmental consequences of alternatives carried forward for analysis will be evaluated, including direct, indirect, and cumulative effects. NEPA compliance associated with Federal, state, and local agency permits will be identified and incorporated into the analysis of potential effects. This step will be conducted after the range of alternatives is identified.

### **4.4 Issue the Draft EIS**

A Draft EIS will be prepared and made available for review by the public, Tribal governments, local, state, and federal agencies. The Draft EIS will be available for a 90-day review after the Notice of Availability has been published in the *Federal Register*. The public hearings will offer another opportunity for public comment on the Draft EIS. Currently, the public comment period is estimated to begin in early 2011. Public Hearings for the Draft EIS are estimated to occur in summer of 2011. To the best of our abilities, hearing dates will be arranged with consideration of local seasonal schedules.

If the analysis of alternatives finds that the proposed action would “significantly restrict subsistence uses,” an Alaska National Interest Lands Conservation Act (ANILCA) Section 810 hearing would be held in the affected area, in conjunction with but separate from the Draft EIS hearing.

### **4.5 Issue the Final EIS and Record of Decision**

After analyzing public comments received on the Draft EIS, the document will be revised to prepare a Final EIS. The Final EIS will include the comments submitted on the Draft EIS, including

changes made to the EIS in response to comments. This step will include public notice of document availability, the distribution of the document, and a 30-day comment/waiting period on the final document. This step is projected to occur in the spring of 2012.

The Service will strive to meet the NEPA requirements of the federal cooperating agencies in this EIS process. The federal cooperating agencies may each issue a separate Record of Decision. The issuance of the Record of Decision(s) will conclude the EIS process in the summer of 2012. The selected alternative will be identified in each Record of Decision, as well as the agency's rationale for their conclusions regarding the environmental effects and appropriate mitigation measures for the proposed project.

## 5.0 Contacts

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### Cooperating Agencies

- U.S. Army Corps of Engineers
- Alaska Department of Natural Resources – coordinating for the State of Alaska agencies
- Agdaagux Tribe of King Cove
- Alaska Migratory Bird Co-Management Council
- Aleutians East Borough
- City of King Cove
- King Cove Corporation