



Izembek

National Wildlife Refuge

Land Exchange/Road Corridor

Environmental Impact Statement

Comment Analysis Report



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ACRONYMS AND ABBREVIATIONS

APA	Administrative Procedure Act
Draft EIS	Draft Environmental Impact Statement
EIS	Environmental Impact Statement
ESA	Endangered Species Act
Final EIS	Final Environmental Impact Statement
NEPA	National Environmental Policy Act
the Act	Omnibus Public Land Management Act of 2009
USC	United States Code

1.0 INTRODUCTION

The Service has prepared a Draft Environmental Impact Statement (EIS) that analyzes 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 some 71,960 submissions providing comments on the Draft EIS. The background to this 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 that all substantive comments be considered and addressed in the Final EIS, a careful and deliberate approach has been undertaken to ensure that 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 A, linking commenters to the applicable Statements of Concern. Appendix B 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.

1.1 BACKGROUND

In the Omnibus Public Land Management Act of 2009 (the Act), Congress directed the Secretary of the Interior to prepare an EIS to conduct an analysis of the 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, U.S. Army Corps of Engineers, Department of Transportation - Federal Highway Administration - Western Federal Lands Division, State of Alaska, Aleutians East Borough, City of King Cove, King Cove Corporation, the Agdaagux Tribe, and the Belkofski Tribe as formal cooperators. The Environmental Protection Agency and Alaska Migratory Bird Co-Management Council also are working with the planning team, though they are not 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, Locations 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 for 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). In addition approximately 200 signatures were submitted on petitions in support of the proposed road. 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 received will be 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 they were 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 Draft EIS, while others focus on procedural or methodological topics. Several submissions included attachments of additional independent analysis or requested specific edits to the Draft 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 will craft a response to each Statement of Concern, and insert revisions in the Final EIS as appropriate. The response to a Statement of Concern is considered the response to the individual comments that are associated with that summary Statement of Concern.

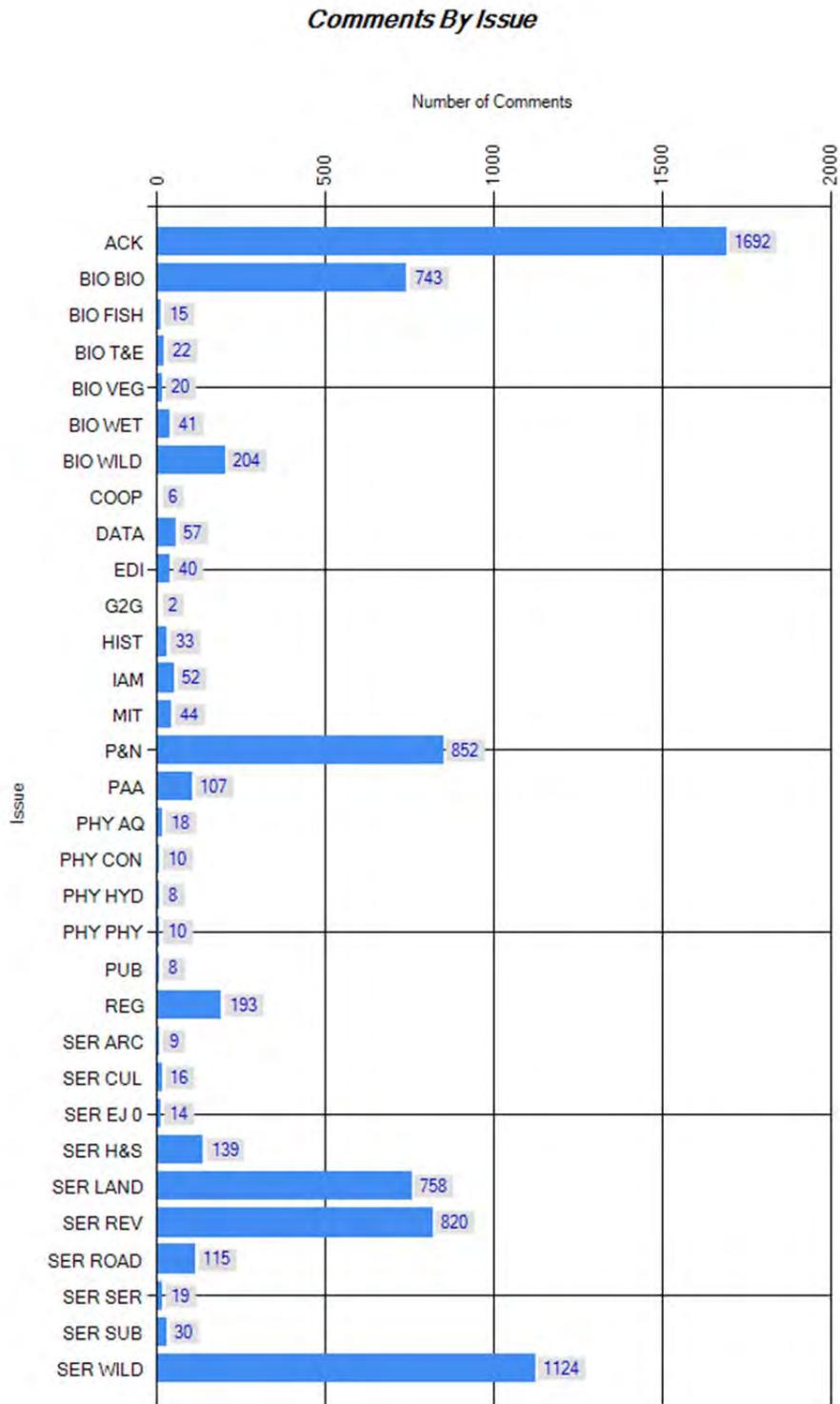
Table 2. Issue Categories for Draft EIS Comments

Group	Issue Category	Issue Code	Issue Summary
Regulatory Compliance	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
Purpose and Need	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.
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. Comments on Preferred Alternative, Environmentally Preferred Alternative
	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. 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.
	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

Group	Issue Category	Issue Code	Issue Summary
	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; more driving-related injuries and human health impacts could result from a road.
	Socioeconomic Resources - Land Use, Public Use, Recreation, Visual Resources	SER LAND	Comments on the potential changes to land use, recreation (i.e. OHV use) or visual resources in the project area. Comments related to the quality or equity of lands proposed for exchange (i.e. high quality habitat, or disproportionate value for exchange parcels).
	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.

Group	Issue Category	Issue Code	Issue Summary
	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.
General	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 A) 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 A; 2) note which Statement of Concern codes are listed under the submissions; 3) locate the Statement of Concern within Section 2.0; and 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 B contains a summary of the Statements of Concern for all form letters received.

Biological Resources - General (BIO)

- 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.
- 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.
- 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.
- BIO BIO 03 The Service failed to adequately analyze the biological effects resulting from the proposed land exchange and road corridor.
- 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.
- BIO BIO 05 The lands proposed for exchange are not vital habitats for significant wildlife.

Biological Resources - Fish (BIO FISH)

- BIO FISH Comments about the impacts to fish, Essential Fish Habitat, and salmonids.
- BIO FISH 01 The Service should consider anadromous waters to be only those anadromous fish streams listed in the Alaska Department of Fish and 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].
- 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.
- BIO FISH 02 The Service should revise these specific areas of the EIS regarding the analysis of the effects to Essential Fish Habitat:
- 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 Mortensen's 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.
 - 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.
 - Fish habitat associated with the Sitkinak Island parcels is not "unique" and will have no measureable effect on fish habitat and populations.
 - 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.

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]:

- Under the updated version of Alternative 1, there is no hovercraft and no resulting effect on Essential Fish Habitat (Essential Fish Habitat).
- 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.
- 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.

BIO FISH 04

The Service should revise these specific areas of the EIS regarding the analysis of the effects to Essential Fish Habitat discussed in Chapter 4:

- There is insufficient information to justify the designation of "major" indirect effect 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].

BIO FISH 05

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, which 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]

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:

- 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].
- 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.
- 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.
- 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.

BIO FISH 07

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.

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

BIO T&E	Comments about the impacts to threatened and endangered species in the project area.
BIO T&E 01	<p>The Service should revise these specific areas of the EIS regarding the analysis of these threatened and endangered species:</p> <ul style="list-style-type: none"> • 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] • 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. • 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. • 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] • 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. • 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] • 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]

- 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]
- 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.
- 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]
- 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.
- 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.
- 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.
- 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.

BIO T&E 02

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.

- 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.
- 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.
- 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.

Biological Resources - Vegetation (BIO VEG)

BIO VEG	Comments regarding impacts to vegetation in the project area.
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]
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]
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]
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.
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.
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.

Biological Resources - Wetlands & Aquatic Communities (BIO WET)

BIO WET	Comments regarding the impacts to wetland habitat and aquatic species (invertebrates) in the project area, including shoreline habitat.
BIO WET 01	The construction of the proposed road would destroy the fragile wetland habitat, which is of global ecological significance.
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].
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.
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.
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]
BIO WET 06	<p>The Service should review these suggested edits for clarification of statements in the wetlands section of the EIS:</p> <ul style="list-style-type: none"> • 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]. • 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]. • 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].

- 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].
- 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].
- 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].
- 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].
- 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].

BIO WET 07

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. 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.

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.

BIO WET 09

The Service needs to consider and incorporate in the EIS additional data and analysis performed and submitted regarding:

- 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]
- 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]
- Miles of Shoreline habitats Removed and Added/Retained under Alternative 2 or Alternative 3. [Table 16 King Cove Group comments] and;
- 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.

BIO WET 10

The effects of exchanging Ramsar or high value wetlands should be re-analyzed in the Final EIS:

- 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.
- 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.
- 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.
- 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.
- 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 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.
- 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.
- 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.

- 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.

Biological Resources – Wildlife (BIO WILD)

BIO WILD	Comments about impacts from road construction and operation to terrestrial and marine wildlife (including waterfowl and marine mammals).
BIO WILD 01	<p>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:</p> <ul style="list-style-type: none"> • 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. • 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. • 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.
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.
BIO WILD 03	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. 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.

BIO WILD 04

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.

BIO WILD 05

The Draft EIS fails to adequately include the following information:

- There is not sufficient information to indicate major effects to fish and several bird species (e.g., Tundra Swans).
- 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.
- 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.

BIO WILD 06

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.

BIO WILD 07

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.

- BIO WILD 08 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.
- BIO WILD 09 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.
- BIO WILD 10 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].
- BIO WILD 11 Regarding the impacts to Tundra Swans the Service needs to reconsider the impacts of the proposed alternatives, specifically:
- 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.
 - 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 mile long 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.
- 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.
- 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;
- 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].

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:

- 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.
- 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.
- 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.
- 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.

- 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].

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:

- 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.
- 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).
- 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.
- 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).

BIO WILD 14

The Service needs to incorporate additional data at the regional scale regarding Tundra Swan breeding pairs in the Final EIS, specifically:

- 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.

- 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.
- 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.
- 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.

BIO WILD 15

Regarding Tundra Swan observations on lands that are proposed for the exchange the Service should consider in the Final EIS that:

- 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.
- 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).

- 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 Mortensen's Lagoon, with an annual average of 1.9 observed breeding pairs or 2.1 estimated breeding pairs recorded across all survey years.

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].

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].

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:

- 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.
- 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 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 other parcels.

- 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.

BIO WILD 19

The Service needs to review impacts to nesting bird species and revise specifically the following areas of the EIS:

- 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.
- 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.
- 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.

BIO WILD 20

The Service should consider clarifying these discussions regarding how and where wildlife is hunted in the text of the EIS:

- Update wording to differentiate between state and federal hunts (see 2011-2012 Alaska Hunting Regulations; available at hunt.alaska.gov): 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].

- 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.

BIO WILD 21

The Service should consider clarifying these discussions regarding wolverines in the text of the EIS for the following reasons:

- 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].

BIO WILD 22

The Service should consider clarifying these discussions regarding large mammals in the text of the EIS as follows:

- 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.

- 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.
- 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].

BIO WILD 23

The Service should consider clarifying these discussions regarding marine mammals in the text of the EIS, specifically:

- 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].
- 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].
- 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.
- 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.
- 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.

- 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.
- 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].
- 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].

BIO WILD 24

The EIS does not adequately describe the impacts to caribou and should clarify the following points:

- 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.
- 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.
- 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.

- 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.
- 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].
- 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].
- 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].

- 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.

BIO WILD 25

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].

BIO WILD 26

The Service needs to clarify the following impacts to migratory birds:

- 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.
- 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.
- 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].
- 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.
- 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. 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.

BIO WILD 27 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].

BIO WILD 28 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].

BIO WILD 29 The Service should revise and clarify the discussion of Alternatives 2 and Alternative 3 on Black Brant specifically:

- 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.
- The estimated adverse effects on the Tundra Swans, brant, and Emperor Goose in Alternatives 2 and 3 may be over stated. 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.

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].

BIO WILD 31

The Service should clarify the discussion regarding brown bears, specifically:

- 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 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.
- 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].
- 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].
- 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]

- 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.
- 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].

BIO WILD 32

The Service should clarify the discussion regarding wolves, specifically:

- 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].
- 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].
- 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].

BIO WILD 33

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].

BIO WILD 34

The Service should reconsider their analysis of the following:

- 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].
- 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].
- 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].

BIO WILD 35

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].

BIO WILD 36

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].

BIO WILD 37

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. 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].

- 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].
- 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].
- 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].
- BIO WILD 41 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].
- BIO WILD 42 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].
- BIO WILD 43 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].

- BIO WILD 44 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].
- BIO WILD 45 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.
- BIO WILD 46 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 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].

BIO WILD 47

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].

BIO WILD 48

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].

Cooperating Agencies (COOP)

COOP	Comments on adequacy of consultation with cooperating agencies.
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.
COOP 02	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.
COOP 03	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.

Data and Available Information (DATA)

DATA	Recommended studies and reports for the Service to review for inclusion in the EIS.
DATA 01	<p>The Service should review the benefit-cost analysis prepared by The Wilderness Society and the Center for Sustainable Economy:</p> <p>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.</p>
DATA 02	<p>The Service should consider these additional references regarding the impact of roads on large carnivores and bears:</p> <ul style="list-style-type: none"> • [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). • [road impacts on bears] Mattson, D., Human impacts on bear habitat use, 8 INTERNATIONAL CONFERENCE ON BEAR RESEARCH AND MANAGEMENT 33-56 (1990). • [road impacts on bears] McLellan, B. and D. Shackleton, Immediate reactions of grizzly bears to human activities, 17 WILDLIFE SOCIETY BULLETIN 269-275 (1989). • [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). • [road impacts on large carnivores] Noss, R., et al., Conservation biology and carnivore conservation in the Rocky Mountains, 10 CONSERVATION BIOLOGY 949-963 (1996). • [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). • [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). • [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). • [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).

DATA 03

The Service should consider these additional references regarding the impact of human disturbance on Black Brant:

- [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).
- [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).
- [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).

DATA 04

The Service should consider this additional data regarding caribou:

- [caribou, human disturbance] Frid, A. and L. Dill, Human-caused disturbance as a form of predation risk, 6 CONSERVATION ECOLOGY 11 (2002).
- 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 ≥ 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) (Alaska Department of Fish and Game 2012x).” [Draft EIS Chapter 3, Page 3-154, Sec. 3.2.5, Paragraph 1]
- 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 2010). 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 2010).” 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]

- 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 <http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.programs>). 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]

DATA 05 The Service should consider this additional reference regarding census data:

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.

DATA 06 The Service should consider these additional references regarding the effects of climate change

- [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).
- [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).
- [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).
- [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).

DATA 07 The Service should consider these additional references regarding the effects of climate change on Steller’s Eider:

- [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).
- [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).
- [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).
- [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).
- [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).
- [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).
- [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).

DATA 08

The Service should consider these additional references regarding the effects of climate change on Black Brant:

- [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).
- [climate change effects on Black Brant] IPCC, CLIMATE CHANGE 2007: SYNTHESIS REPORT, An Assessment of the Intergovernmental Panel on Climate Change, Available at www.ipcc.ch (2007).
- [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).
- [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).
- [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 <http://www.asnamnat.org/node/157?page=1> (2011).

- [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).
- [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).

DATA 09

The Service should consider these additional references regarding the effects of climate change on caribou:

- [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).
- [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).

DATA 10

The Service should consider these additional references regarding the effects of climate change on sea ice:

- [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).
- [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)
- [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).
- [sea ice, climate change] National Snow and Ice Data Center, Weather and feedbacks lead to third-lowest extent, available at <http://nsidc.org/arcticseaicenews/2010/100410.html> (2010).
- [sea ice, climate change] 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 (October 1, 2007).
- [sea level rise, climate change] Richter-Menge, J., et al., Arctic Report Card 2008, <http://www.arctic.noaa.gov/reportcard> (2008).
- [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).
- [arctic sea ice, climate change] Stroeve, J., et al., Arctic sea ice extent plummets in 2007, EOS TRANSACTIONS, AGU 89:13-14 (2008).

- [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).
- [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).
- [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).

DATA 11

The Service should consider these additional references regarding the effects of climate change on sea levels:

- [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).
- [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).
- [sea level rise, climate change] IPCC, CLIMATE CHANGE 2007: SYNTHESIS REPORT, An Assessment of the Intergovernmental Panel on Climate Change, Available at www.ipcc.ch (2007).
- [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).
- [sea level rise, climate change] Milne, G. A., et al., Identifying the causes of sea-level change, NATURE GEOSCIENCE 2 (2009).
- [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).
- [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).
- [sea level rise, climate change] Rahmstorf, S., A semi-empirical approach to projecting future sea-level rise, 315 SCIENCE 368-370 (2007).
- [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).

DATA 12

The Service should consider these additional references regarding the effects of climate change on ocean acidification:

- [ocean acidification, climate change] Fabry, V.J., et al., Ocean acidification at high latitudes: the bellweather, 22 OCEANOGRAPHY 160-171 (2009).
- [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).
- [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).
- [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], <http://www.arctic.noaa.gov/reportcard> (2011).
- [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).

DATA 13

The Service should consider these additional references regarding the effect of roads on terrestrial and aquatic ecosystems:

- [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).
- [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).

DATA 14

The Service should consider these additional references regarding economic data:

- http://www.alutianseast.org/index.asp?Type=B_BASIC&SEC={1F268E2C-8D7D-41CE-92A5-FC9954BAA953}
- http://www.alutianseast.org/index.asp?Type=B_BASIC&SEC={F01C70F6-028E-4181-83DD-90BC0F27E9FE} 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:
- So that Cold Bay residents could independently commute to jobs in King Cove, where the unemployment rate is 0.2%.
- 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:

- http://www.hovercraftalaska.com/mainpages/hnpages/cur_news/KingCove.html
- http://en.wikipedia.org/wiki/Cold_Bay,_Alaska
- http://www.commerce.state.ak.us/dca/commdb/CIS.cfm?Comm_Boro_Name=Cold%20Bay
- <http://www.zipdatamaps.com/99571>
- http://en.wikipedia.org/wiki/King_Cove,_Alaska
- http://www.commerce.state.ak.us/dca/commdb/CIS.cfm?Comm_Boro_name=King%20Cove

- DATA 15 The Service should consider this additional reference regarding endangered species:
- Kirchhoff, M. and V. Padula. 2010. The Audubon Alaska WatchList 2010. Audubon Alaska, Anchorage, AK 99501.
- DATA 16 The Service should consider this additional reference regarding effect of human impacts on the environment:
- 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: http://www.hcn.org/blogs/goat/trampled-by-tourists?utm_source=wcnl&utm_medium=email
- DATA 17 The Service should consider reviewing and incorporating additional information:
- 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].
 - As stated previously, there are several areas where additional data would be helpful or essential to the Secretary'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]
- DATA 18 The Service should consider these additional references regarding hovercraft service suspension:
- 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

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._APRIL_23_2012\(1\).pdf](http://aleutianseast.org/vertical/sites/%7BEBDABE05-9D39-4ED4-98D4-908383A7714A%7D/uploads/ASSEMBLY_MTG._APRIL_23_2012(1).pdf)

DATA 19

The Service should consider these additional references regarding land use:

- 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.]
- 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).

DATA 20

The Service should consider this additional reference regarding marine mammals:

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.

- DATA 21 The Service should consider this suggestion for including statistics on the importance of a road:
- 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.
- DATA 22 The Service should consider this additional reference regarding noise disturbance to wildlife:
- [noise disturbance, wildlife] Wayle Laboratories, CALIFORNIA OFF-HIGHWAY VEHICLE NOISE STUDY, Prepared for the State of California Department of Parks and Recreation (2005).
- DATA 23 The Service should consider this additional reference regarding resources identified:
- Summary of Resources on 16,126 Acres of King Cove Ownership Identified in Subtitle E. [See Table 11 on page 27 of submission 51978]
- DATA 24 The Service should consider these additional references regarding seismic data:
- 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).
 - 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.
- DATA 25 The Service should consider these additional references regarding soil analysis:
- [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).

- [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).
- [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).
- [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).

DATA 29

The Service should consider these additional references regarding wetland and hydrology impacts:

- [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).
- [wetland impacts] Winter, T.C., A Conceptual Framework for Assessing Cumulative Impacts on the Hydrology of Nontidal Wetlands, 12 ENVIRONMENTAL MANAGEMENT 605-620 (1988).

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."

Editorial (EDI)

- EDI Comments associated with specific text edits to the document (i.e. grammar, punctuation, and consistency in usage).
- EDI 01 The Service should consider incorporating the following edits into the Executive Summary.
- [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.
 - [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 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, 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.”
 - [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?
 - [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?
 - 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.
- EDI 02 The Service should consider incorporating the following edits into Chapter 1.
- 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 ... "
 - 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.
- [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.
- [Page 1-6 under Health Safety description - 3rd paragraph:] 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”.
- 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
- 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.

EDI 03

The Service should consider incorporating the following edits into Chapter 2.

- 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 Attachement 1 to KCG Comments]

- 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
- 2-38 2.4.3 Last paragraph DOT&PF would be the “project applicant”.

EDI 04

The Service should consider incorporating the following edits into Chapter 3.

- 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?”
- [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.
- 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.
- Chapter 3, Page 3-261, Figure 3.3-19, Paragraph 1 I believe the AK Peninsula boundary is incorrectly displayed. Fix in FEIS
- 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.
- 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.
- Chapter 3, Page 3-16, Sec. 3.1.3.8, Paragraph 1 Aleutian Seismic zone Change to Aleutian subduction zone
- 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”.
- 3-103 Anadromous Waters Suggest this section be titled “Anadromous Fish Waters”.
- 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. 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.

EDI 05

The Service should consider incorporating the following edits into Chapter 4.

- 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.
- Chapter 4, Page 4-174 Formatting is inconsistent - underline of subject titles and no underline.
- 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
- 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

EDI 06

The Service should consider incorporating the following edits into Appendix F.

- 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.
- 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.”

EDI 07

The Service should consider incorporating the following edits into project presentations.

- 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.

Government to Government Consultation (G2G)

- G2G Comments on consultation with Tribal Governments.
- 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.
- G2G 02 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.

Legislative History (HIST)

HIST	History of previous legislative and administrative actions regarding a proposed King Cove Road.
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.
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.
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.
HIST 04	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.
HIST 05	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.
HIST 06	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 Interior finds it in the public interest.
HIST 07	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.

HIST 08

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.

NEPA Impact Analysis Methods (IAM)

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.
IAM 01	<p>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:</p> <ul style="list-style-type: none"> • economic development opportunities; • the overall environment by adding tens of thousands of acres of wilderness; • increase visitors to the refuge and enforcement ability; • the value of the tax dollars save by utilizing the most economical mode of transportation; and • value of the lives that are saved.
IAM 02	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.
IAM 03	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.
IAM 04	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

- 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.
- avoiding the threat of reasonably foreseeable effects of oil and gas leasing on the state parcel or adjacent off-shore state ownership,
- 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.
- 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].

- IAM 05 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.
- IAM 06 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].
- IAM 07 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:
- projections of the frequency and spatial extent of unauthorized access in the designated wilderness,
 - 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.
- IAM 08 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.

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 effect category of habitat alterations should include a specific assessment for habitat loss,
- 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.
- a fuller definition should be provided for “changes in resource character” in relation to the intensity levels for the habitat alteration impact criterion.

IAM 10

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].

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.

Mitigation Measures (MIT)

MIT	Suggested measures to reduce the impact of the proposed action and alternatives.
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.
MIT 02	<p>The EIS should more fully describe, clarify, or examine the effectiveness of general mitigation measures, including:</p> <ul style="list-style-type: none"> • 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. • 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. • 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. • 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. • 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. An intensive survey could be required as mitigation through a Section 106 agreement in accordance with 36 CFR Part 800.
MIT 03	<p>The EIS should more fully evaluate the design and effectiveness of the cable barrier system including:</p> <ul style="list-style-type: none"> • 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. • 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.

- 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.
- 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.

MIT 04

The EIS should evaluate additional specific mitigation measures or monitoring for wildlife including:

- 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.
- 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.

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.

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.

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.

- MIT 08 Paving the road from King Cove to Cold Bay would mitigate the adverse impacts of dust on vegetation from a dirt road.
- 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]
- 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]
- 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.
- MIT 12 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.
- MIT 13 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.
- MIT 14 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.
- MIT 15 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. 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.

MIT 16

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.

Physical Resources (PHY)

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.
PHY PHY 01	Revise impact analyses of Alternative 1 of Noise and Geology and Soils to reflect no hovercraft operation.
PHY PHY 02	Comments requested clarification and additional information on risks associated with volcanoes, including: <ul style="list-style-type: none"> • 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, • 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].
PHY PHY 03	Commenters requested revisions to the analysis of seismic hazards: <ul style="list-style-type: none"> • Quantify the statement regarding earthquakes of "significant magnitude" with a statement explaining what magnitude is considered to be significant in this context. • 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.
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.
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.
PHY PHY 06	Clarify conclusions regarding geology and soils. [Draft EIS Page 4-106 Geology and Soils]

Physical Resources - Climate & Air Quality (PHY AQ)

- PHY AQ Comments related to air quality impacts (criteria pollutants) and emission of greenhouse gases; comments related to climate change impacts.
- 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:
- Dirt and fumes introduced into the environment creates dirty snow that could exacerbate global warming.
 - 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.
 - 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]
- PHY AQ 02 Climate change occurring on a global scale can affect the project area. Specific comments include:
- 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.
 - 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.
 - 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.
 - 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.

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]

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

PHY CON	Comments related to the possible accidental release of hazardous materials, existing site contamination, or the need for an ecological risk assessment.
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]
PHY CON 02	Confirm the location data for the AT&T Alaskcom 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.
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]
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.
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.
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]

Physical Resources - Hydrology (PHY HYD)

PHY HYD	Comments about potential hydrological changes from the proposed road construction or operation.
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.
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.
PHY HYD 03	Address the impact of the road on natural hydrology and drainage patterns, including: <ul style="list-style-type: none"> • 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. • Address the consistency in characterization of whether cross drainage structures are effective in maintaining localized drainage patterns throughout the document.
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.
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.
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.
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.

Proposed Action and Alternatives (PAA)

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.
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].
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.
PAA 03	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.
PAA 04	The EIS should fully describe the limitations of the hovercraft and other current transit options to provide safe and reliable transportation, including: <ul style="list-style-type: none"> • 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. • 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.
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).
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.

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.]

- Clarify the constant costs associated with maintenance of the access road to the Northeast Hovercraft 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.
- 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.
- 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.
- Provide further information of the commitment by the Aleutians East Borough to evaluate weather-related operating conditions at the Northeast Hovercraft 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, since the Aleutians East Borough does not plan to operate a hovercraft. [Draft EIS Page 2-19]
- 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.

PAA 08

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.

PAA 09

Clarify the status of the completion of the road to the Northeast Hovercraft Terminal, and the relation to the proposed action to extend a one lane road from the Northeast Hovercraft Terminal to the road system near Cold Bay.

- 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.
- The frequency of hovercraft service should be the same between alternatives 1 and 4 to enable a fair comparison of operating costs.
 - 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.
- 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.
- 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.
- PAA 13 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.
- Alternative 1 should indicate the Hovercraft will not be restarted and the Borough will not commit \$1 million to hovercraft operation.
 - 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”.
 - 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.
 - 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.
- PAA 14 Suggestions for modifications of the Alternatives presented in the Draft EIS are:
- Revise to allow reasonable public access along the road way.

- 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.
- 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.
- 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.

PAA 15

Suggestions for additional marine alternatives include:

- 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.
- Co-purchase an additional hovercraft, and repair the existing one.
- Contract with or co-purchase sea ambulances or a fleet of sea taxis and hire captains to run them.
- 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.

PAA 16

Suggestions for additional or modified road alignments include:

- Build the road right across the Kinzarof spit and just make a short route with a couple little bridges.
- Build underground wildlife crossings beneath the road.
- Utilize existing roads that were shut down after World War II to the greatest extent practical.
- Consider a road alignment that routes around Izembek.

PAA 17

Suggestions for additional aircraft alternatives include:

- 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.
- 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.

- 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.
- PAA 19 Suggestions for modifying land swap include:
- 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.
 - 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.
- 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 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.
- PAA 21 The No Action Alternative (Alternative 1) is the environmentally preferred alternative.
- PAA 22 Comments suggesting the road alternatives are the Preferred Alternative include:
- 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.
 - 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).
- PAA 23 The best transportation alternative for all involved is a ferry out of Lenard Harbor. That is the environmentally preferred transportation alternative.

- 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.
- PAA 25 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 & 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.
- PAA 26 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.

Public Involvement and Scoping Process (PUB)

- PUB Comments on compliance with the NEPA process for public scoping or the public comment period.
- PUB 01 Concerned 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.
- 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.
- PUB 03 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].

Purpose and Need of the Action (P&N)

P&N	Comments on the purpose and need of the project; including health and safety, quality of life and transportation systems.
P&N 01	<p>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:</p> <ul style="list-style-type: none"> • The Aleutians East Borough began constructing a 17.6 mile road between King Cove and the site of a hovercraft 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. • There is a ferry service between the communities of King Cove and Cold Bay. • Both Cold Bay and King Cove have airports for quick shuttle between them.
P&N 02	<p>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.</p> <ul style="list-style-type: none"> • 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. • 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.
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.</p>

- P&N 04 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&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.
- 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.
- 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.
- P&N 08 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&N 09 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&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.
- 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.

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.

P&N 13

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&N 14

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.

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

- 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.
- 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.
- REG 02 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.
- REG 03 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.
- REG 04 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.

REG 05 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's public interest determination supersedes, or is in lieu of, the Secretary'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.

REG 06 The Service is requested to clarify the review process for the Secretary of Interior's Public Interest Determination:

- The EIS should explain what the Secretary'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.
- 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].
- [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?

REG 07 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.

- REG 08 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)).
- REG 09 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.
- REG 10 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.
- REG 11 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.
- 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.

- 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:
- 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.
 - 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;
 - 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;
 - what the consequences are for defaulting on the Ramsar Convention and how international law may affect the project.
- 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:
- 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;
 - determined that the state parcel comprising 31,887 acres qualifies for addition to the National Wilderness Preservation System;
 - specified that the King Cove Corporation will relinquish 5,430 acres of land that would otherwise be removed from the Izembek Wilderness;
 - implied that changes in land use would include the loss of up to 152 acres of the Izembek Wilderness.
 - outlined the stipulations, mitigation measures and regulations that determine what is considered commercial driving.
- REG 15 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.
- REG 16 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:

- [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.
- [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.
- [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.
- [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 . . ."

REG 17

The Final EIS should clearly explain the process that the Secretary 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'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 will presumably also consider his Indian trust responsibilities when determining public interest.

- REG 18 The following revisions regarding the permitting process for road construction are requested for the Final EIS:
- [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.
 - [Draft EIS 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 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.
 - [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.
- REG 19 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].
- REG 20 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].
- 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.

- REG 22 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.
- 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 will be able to hear the statements of local people affected by the road.
- 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.
- 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.
- 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").
- REG 27 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.
- REG 28 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:
- 1) The Omnibus Public Lands Act directs the Secretary 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 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.”

2) Upon completion of the EIS, the Act requires the Secretary to determine whether the exchange is in the “public interest.” The Act provides no guidance as to what the Secretary 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 must balance the various and compelling local and national level public interests.”

3) According to the DEIS, if, and only if, the Secretary 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 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. “

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: 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.

Lastly, it is essential that the Draft EIS better articulate what “various and compelling local and national level public interests” the Secretary 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.

Socioeconomic Resources (SER)

SER	General comments on socioeconomic resources and analysis.
SER SER 01	<p>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:</p> <ul style="list-style-type: none"> • 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. • 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. • 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. • Young people would not move away and go live in other communities where travel time does not mean the difference between life and death.
SER SER 02	<p>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.</p>
SER SER 03	<p>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.</p>
SER SER 04	<p>The Draft EIS should be revised to reflect that the road alternatives will not bring in jobs or improve safety between the communities.</p>
SER SER 05	<p>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:</p> <ul style="list-style-type: none"> • The difference between King Cove residents (permanent or temporary workers) living in group quarters versus standard housing [Draft EIS p. 3-215, first paragraph]; • The gender and age characteristics of the populations of King Cove and Cold Bay [Draft EIS p. 3-223, 3-224];

- Levels of educational attainment between the residents of King Cove and Cold Bay [Draft EIS p. 3-229, last paragraph];
- 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].

SER SER 06

The Draft EIS should be revised to reflect accurate information about the City of King Cove sales tax, including:

- 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.
- The sentence and reference to (Boyette 2011) sharing sales tax information is likely wrong and should be corrected.

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 City of King Cove hydro-power facility operates year round;
- The City of King Cove has bigger, newer, and more energy-efficient diesel-powered generators;
- The City of King Cove does not supply any power to an industrial user (Peter Pan Seafoods);
- The public utility in King Cove is city-owned, not borough-owned;
- 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.

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].

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.

Socioeconomic Resources - Archeological/Cultural Resources (SER ARC)

SER ARC	Comments related to impacts to historic properties and cultural resources (impacts to physical objects).
SER ARC 01	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. An on-site evaluation of the road corridors by a qualified archaeologist is necessary to identify potentially affected resources/properties.
SER ARC 02	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.
SER ARC 03	<p>The following documentation and edits related to archaeological, historic, and cultural resources should be made in the Final EIS:</p> <ul style="list-style-type: none"> • 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 adequate information to make an informed decision, and also does not meet the Service's National Historic Preservation Act obligations. • 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]. • 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]. • 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. • 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.
SER ARC 04	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.

Socioeconomic Resources - Cultural Values (SER CUL)

- SER CUL Comments on how the road may bring cultural changes or that traditional knowledge should be used as part of the analysis.
- 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.
- 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.
- 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.
- 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].
- 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].

Socioeconomic Resources - Environmental Justice (SER EJ)

SER EJ	Comments related to the environmental justice analysis or data used for the analysis.
SER EJ 01	<p>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:</p> <ul style="list-style-type: none">• King Cove residents’ health has a high probability of greatly suffering if Secretary Salazar finds that the road is not in the public interest.• 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.
SER EJ 02	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.
SER EJ 03	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.

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

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.
SER H&S 01	<p>The Draft EIS does not adequately describe the danger and fear in traveling by air or boat during extreme weather.</p> <ul style="list-style-type: none"> • Extreme weather prevents air travel. • The Cold Bay and King Cove airports are perceived as dangerous and/or tricky to fly into. • 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. • 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. • Children have a fear of leaving the village; fear of flying to Anchorage. • One resident described their preference for the ferry rather than flying because they are so scared of it. • 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.
SER H&S 02	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.
SER H&S 03	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.

- 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.
- 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.
- 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.
- If people try to make it to Cold Bay in bad weather and break down, they would threaten the lives of would-be rescuers.
- In general, more people die in cars than in aircraft.
- To maintain the road for travel in such conditions would clearly jeopardize life.
- 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.
- 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.
- Under the poor weather scenarios, the road is a hazard in and of itself.

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.

- It seems that people who are fighting against the road alternatives have no idea of what conditions are in a remote Alaskan village.
- Safe travel for anyone is essential; most especially those who do not have the medical facilities, staff, etc.
- 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.

- We need a demonstration from the government that our lives count.
- We need peace of mind.
- We think our lives are more important than wildlife.

SER H&S 05

The EIS lacks detail about the numbers and nature of medical emergencies:

- How many medical emergencies have there been? What kind are they (e.g. age related? Life threatening? Lifestyle related?)
- 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?
- How many people have died waiting for medical evacuations?
- How many more people do you estimate will die if the road will not be built?

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.

SER H&S 07

Additional statistics about health outcomes should be included in the FinalEIS:

- 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.
- We have a challenge keeping health care providers in a stressful environment.
- Don Young's office knows of at least 11 occasions when people have died waiting for medical evacuations. There must be more than this.
- 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.
- Would we have longer life expectancies if we have more emergency options?
- 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?

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.

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

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).

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:

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.

- The 61,000 acre exchange lands do not provide comparable protection or habitat; they are not ecologically equivalent.
- 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.
- 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.
- The value of wilderness diminishes when fragmented; impacts are irreversible.
- Nothing could replace the staging area of the entire population of one species, the Pacific Brant.
- The lost habitat is significant to the United States and internationally significant wildlife.
- The impacts of the road could not be mitigated by the exchange of a larger quantity of land.

- The impacts to wilderness land cannot be mitigated.

SER LAND 02

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.

SER LAND 03

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.

- 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.
- Hunters from around the world would be drawn to hunt off of the new road.
- A person described that subsistence hunters that 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.

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:

- This would significantly negate many of the claimed benefits that would result from an exchange of lands.
- 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.
- How would illegal off-road vehicle use be prevented?
- 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.

SER LAND 05

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.

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.

SER LAND 06

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.

- 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.
- 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).
- 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.

- 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.

- SER LAND 07 Izembek National Wildlife Refuge sees very low use compared even to many other refuges in Alaska. It could support more public use and access without significant impacts to its original purpose.
- 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.
- 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.
- SER LAND 10 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.
- SER LAND 11 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 Inc. land values involved in the proposed land exchange.
- 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.

- 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.
- 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.
- 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.
- In addition, the Affected Environment Section of the Draft EIS 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 Final EIS in order to adequately inform the decision makers.

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.

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.

- 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.
- SER LAND 15 The following effects to Land Use should be modified in the Final EIS:
- 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.
 - 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.
 - 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.
 - 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 Preservation System.
- 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.
- SER LAND 17 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]
- SER LAND 18 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.

SER LAND 19

The Final EIS should incorporate the following edits to the Land Use sections Executive Summary through Chapter 2:

- [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.
- [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?
- [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.
- [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.
- [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."
- [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.

SER LAND 20

The Final EIS should incorporate the following edits to the Land Use sections Chapter 3:

- [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."
- [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.
- [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?

- 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.
- [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.
- [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".

SER LAND 21

The Final EIS should incorporate the following edits to the Land Use sections Chapter 4:

- [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.
- [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.
- [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."

SER LAND 22

The Final EIS should incorporate the following edits to the Public Use sections:

- For the same reasons described under Land Use, there should be an overall major positive effect on public use under Alternative 2 or 3.
- 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.

- 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.
- [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.
- The Draft EIS needs to provide a graphic with the 17(b) easements shown in relationship to the existing transportation system
- [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.
- [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.
- 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.

SER LAND 23

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].

Socioeconomic Resources - Public Revenue and Fiscal Considerations (SER REV)

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.
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.
SER REV 02	<p>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.</p> <ul style="list-style-type: none"> • 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.
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.
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.
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.
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.

- SER REV 07 Include the cost of medical evacuation service (\$30,000 per evacuation) in the analysis.
- 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.
- 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.
- SER REV 10 The cost of building and maintaining the road will not burden the taxpayer.
- 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.
- 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.

Socioeconomic Resources - Road Design, Bridges, Transportation, Planning and Transportation Systems (air, water and road) (SER 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.
SER ROAD 01	<p>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> <ul style="list-style-type: none"> • 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 • climate change (more frequent and stronger storms, changing water levels) will result in more extreme weather along the road; • steep terrain/slopes (that could cause avalanche), wetland depressions, unstable volcanic soils • persistent fog, year-round • frequent winter storms would cause icing, drifting, slides, and blowing snow that reduces visibility to near zero at times • plowing snow does not affect visibility • 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.) • 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.
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> <ul style="list-style-type: none"> • 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.

- 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.
- 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.
- SER ROAD 05 The Draft EIS is missing information about historic and existing roads in the project area.
- 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,
 - 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.
 - 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 Moffit Lagoon. One went 5/8 the 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.
- 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.

- 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.
- SER ROAD 08 Road maintenance would not be an issue; you simply need the right equipment.
- If they can do it in Valdez, they can do it here.
 - 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.
- 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.
- 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.
- SER ROAD 11 Maintenance estimates of the road are too low:
- 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.
 - 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 to have people out there 24 hours a day, literally, plowing the roads to keep them open.
 - 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.
 - [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.
- 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.

SER ROAD 13

Please revise the Transportation section to reflect the following:

- [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).
- [Draft EIS Page 3-265-266] There is no vehicle registration process or requirement in King Cove.
- [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.
- [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.
- 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.
- 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.

SER ROAD 14

The reliability of the road and air travel is disputed.

- 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.
- 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.

- 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.
- 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.

SER ROAD 15

The reliability and/or viability of the hovercraft is questioned, therefore the Draft EIS should be revised to reflect the following:

- 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.
- 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.
- 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.
- The hovercraft only worked until the weather got to thirty to forty knot winds. Then it was grounded.
- [Draft EIS Page 3-270] The section must be rewritten to reflect permanent suspension of Hovercraft operations.
- [Draft EIS Page 332] Delete the picture of hovercraft; this is misleading the public that the vessel is still a viable option.
- [Draft EIS Page 4-10, 4-11] Delete reference to the Aleutians East Borough hovercraft resuming operation.

- [Draft EIS Page 4- 13] Delete reference to the hovercraft on the bullet list at top of the page.
- Delete Hovercraft 590 tons per year on Table 4.2.1-2.

SER ROAD 16

There is a dispute about some facts regarding the ferry system. In some cases, more details are needed.

- [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 versus private, etc.)
- [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.
- [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.
- 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.
- 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.
- The Lenard Harbor ferry alternative is not feasible because Cold Bay Dock and Lenard Harbor ice up during the winter.

SER ROAD 17

The following tables should be analyzed for inclusion in the alternatives analysis and transportation sections:

- 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.
- 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.
- Table 7. Summary of the King Cove Group Conclusions on the Reliability of Hovercraft Transportation between the Northeast Corner of Cold Bay and Cross Wind Cove under Alternative 4.
- 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.
- 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.
- 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]

SER ROAD 18

The road design described in the Draft EIS is not adequate to allow for road construction, operation, and maintenance.

- 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.
- [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.
- [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.
- [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.
- [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.
- [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.

- [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.
- [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.
- Recommend a minimum four-foot flat bottom ditch. At a minimum the depth of the roadside ditches should be increased.
- [Draft EIS 2-27 & 2-36 Design] The proposed roadway (width & height) should allow for adequate cover for minimum culvert size of 24 inches all culverts.
- [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.
- [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.
- 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.
- With up to 158 pull-outs, a person might as well build the road with 2 lanes.

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.
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.
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.”

- 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?
- 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]
- 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.
- SER ROAD 25 [Draft EIS Page 4- 15] Delete 127 cars and revise to appropriate number equivalency based on ferry only.
- 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.
- SER ROAD 27 Details about the material and disposal sites and materials sources are inadequate.
- [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
 - [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 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.
 - [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.
 - [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.

- 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.
- Material sources (especially side borrow production) should be discussed.

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."

SER ROAD 29 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.

SER ROAD 30 Alternative 2 and 3 General Comment. 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. 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.

SER ROAD 31 [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.

SER ROAD 32

The Service is requested to clarify the review process for the Secretary of Interior's Public Interest Determination:

- The EIS should explain what the Secretary'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.
- 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].
- [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?
- 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.
- [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.
- [Draft EIS 2-23 Table 2.4-2] Should address temporary construction impacts, which will likely result in wider corridor in mountainous areas.

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.

- [Draft EIS 2-28] Recommend a field investigation along both road corridors with soil probes as necessary to assist in the preliminary engineering analysis.
- [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.

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.

SER ROAD 35 There are problems associated with bollards or any barrier type used along the road.

- Barriers of any type along roadway could significantly increase long-term maintenance costs.
- [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.
- [Draft EIS 2-27] Recommend installing signs along roadway and installing the barrier at locations deemed to be problematic.
- 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.
- How would snowplows get around the cable barrier?

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.

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 site or adjacent King Cove Corporation lands. Contractors routinely establish field camps when working in rural Alaska.

Socioeconomic Resources - Subsistence (SER SUB)

SER SUB	Comments on impacts to subsistence resources and subsistence activities.
SER SUB 01	<p>The Draft EIS does not adequately analyze how the proposed road could impact subsistence resources and use and should be revised:</p> <ul style="list-style-type: none"> • 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. • 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. • 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. • 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. • 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. • 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.
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.
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:

- 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.
- 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.
- 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.

- 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.
- 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.
- 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:
- 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.
- 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.

Socioeconomic Resources - Wilderness (SER WILD)

SER WILD	Comments on changes to wilderness values in the Izembek Wilderness related to the conveyance of the selection or construction of the proposed road.
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.
SER WILD 02	<p>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):</p> <ul style="list-style-type: none"> • Integrity of habitat for rare plant and animal species • Unfragmented habitat • Source of escape and renewal for human populations
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.
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.
SER WILD 05	The Draft EIS incorrectly claims that “[a]ctions that intentionally manipulate or control ecological systems inside wilderness degrade the untrammelled quality of wilderness character.” 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 Draft EIS should correctly represent this important distinction.

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].

SER WILD 07

The impact discussion on wilderness characteristics in the Draft EIS should be revised to address the following points:

- Delete sentence on hovercraft which is stand-alone [Draft EIS p. 4-92, third paragraph]
- Delete reference to hovercraft on Draft EIS page 4-93.
- 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.
- Effect on wilderness and cumulative effects should be major. This meets the long term, permanent, measurable effects described on Draft EIS Page 4-4.
- Delete mitigation measures since no hovercraft use.

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.

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.

- SER WILD 09 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.
- SER WILD 10 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.
- SER WILD 11 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."
- [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.
- SER WILD 12 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.

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.

SER WILD 13

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. 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.

Comment Acknowledged (ACK)

ACK Submissions without substantive comments and/or duplicate submissions.
ACK 01 Comment Acknowledged.

APPENDIX A

Unique Submission and Comment Index

Commenter	Submission ID	Comments
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

Commenter	Submission ID	Comments
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
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

Commenter	Submission ID	Comments
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
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Name Withheld	51746	ACK 01
Name Withheld	51753	SER WILD 02
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	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	51993	P&N 01, P&N 11, PAA 15, PAA 18, PAA 21, SER REV 03, SER REV 04, SER REV 09
Ruth	52587	BIO BIO 02
Simone	53303	REG 03
A, Clayarts	51144	SER WILD 02
Abrams, Rochelle	44242	ACK 01
Acker, Robert	52347	SER REV 09
Acora, Frederica	51549	ACK 01
<i>Alaska National Wildlife Federation</i> Adams, Jim	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
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
Albers, Carla	51110	BIO BIO 01, P&N 06, SER LAND 01, SER

Commenter	Submission ID	Comments
		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
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
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
Aiken, Ed	44219	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Anderson, Bob	31742	ACK 01
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

Commenter	Submission ID	Comments
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
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 Walton, William	43932	ACK 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

Commenter	Submission ID	Comments
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
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
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

Commenter	Submission ID	Comments
Bay Conservation Society, Kachemak	51034	BIO BIO 01, P&N 06, SER WILD 01
Beal, Carrie	44282	ACK 01
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
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
<i>The Wilderness Society</i> Beller, Melanie	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
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

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		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
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
<i>Western Lands Project</i> 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
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
Bobroff, Marc	51324	BIO BIO 01, P&N 02
Boehling, Burton	31644	BIO BIO 01, P&N 06, SER LAND 01, SER

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		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
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
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

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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
Brisette, 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
Brocious, 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
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

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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
Byers, Andrea	51001	SER WILD 01
Byrne, Anthony	51637	P&N 02
C. Fischer, Courtney	51540	BIO WILD 01, SER LAND 01, SER WILD 09
C. Markowitz, John	51591	ACK 01
C. Wenzel, Kenneth	51460	ACK 01
Cain, Barbara	53090	BIO WILD 01
Caldie, Cathy	51539	SER LAND 09
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
Calhoun, Helle	51547	BIO BIO 02
Callahan, Ann	51067	SER WILD 01
Cameron, Rick	37426	ACK 01
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

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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
<i>State of Alaska</i> 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
Carrubba, Sandra	52570	BIO BIO 02
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

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Cellier, Alfred	51527	SER WILD 01
Cencula, Dave	51806	ACK 01
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
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
Clark, Isabel	52749	SER ROAD 01
Clark, Lorelee	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
Clark-Kahn, Lisa	51586	ACK 01
Clarke, Nick	44084	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 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
<i>National Resources Defense Council</i> Clusen, Charles	31763	PAA 03, PAA 26, REG 08
<i>Natural Resources Defense Council</i>	51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO

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Clusen, Charles M.		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
Coates, Portland	31707, 34048	BIO BIO 01, P&N 02, P&N 06, SER REV 09, 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

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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
<i>Alaska Center for the Environment</i> 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
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
County ETF, Adams	51440	BIO BIO 01, SER WILD 01
Courtney, John	37394	ACK 01, SER WILD 09
Cowart, Mary	51362	ACK 01
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

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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
Crumbly, 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'Amato, Susan	31664	BIO BIO 01, P&N 06, SER LAND 01, SER ROAD 01, SER WILD 01
D'Antonio, Kitty	31712	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
D'errico, Didi	43910	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
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
Darst, Kitty	51486	ACK 01
Dashe, Julia	51131	BIO BIO 01
Dass, B	51894	SER WILD 01
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

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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
DeFerie, Steph	37374	ACK 01
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
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
DH van der Scheer, Kilian	44245	ACK 01
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, Patrick	31721	SER WILD 08
Doherty, Pat	91344	ACK 01
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

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		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
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
<i>Gunderboom</i> Dreyer, H.B.	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
<i>Defenders of Wildlife</i> 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

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		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
Duval, Robert	51250	ACK 01
Dye, C	81674	ACK 01
E Bolton, Randy	51388	P&N 02, SER WILD 01
E Madden, Don	51322	SER WILD 08
E Moore, Mary	44121	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
E Zimmermann, Adele	51578	BIO WILD 01, SER REV 02, SER ROAD 01
E. Fraley, Lawrence	51675	SER WILD 09
E. Handwerker, Dr.Steven	44206	ACK 01
E. Palko, Patricia	37388	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
E. Smith, Allen	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
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
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

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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, 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
Eve Shapiro, Dr.	51640	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Evenson, Marilyn	31590, 51645	SER SUB 01, SER WILD 02
F Tauber, Sharon	51748	SER WILD 01
F. Klipfel II, George	44213	REG 03
F. LaRue, Jesse	51568	ACK 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
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

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Fast and Frances Smith, Wendy	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
Figueroa, 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
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
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

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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
<i>Blue Goose Alliance</i> Fowler, Roanld	31763	PAA 03, PAA 26, REG 08
<i>Blue Goose Alliance</i> 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
Fox, Sandra	44093	BIO BIO 01
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
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
Fritsch, Robert	51618	ACK 01
Frost, Stephen	51036	ACK 01
Fugate, Peggy	51338	BIO BIO 01, P&N 06, SER LAND 01, SER

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		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
G, Marc	43922	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
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
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

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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
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
<i>American Birding Association</i> 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

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		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, Ashten	62871	ACK 01
<i>Agdaagux Tribal Council</i> Gould, Dale	52030	HIST 07, SER H&S 01
<i>Agdaagux Tribe of King Cove</i> 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, 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
<i>King Cove Corporation</i> Gould, Dean	52041	HIST 03, SER H&S 04, SER WILD 10

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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, 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, 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
Gould Mack, Gary	62870	P&N 08, P&N 14, SER H&S 04
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
Gramstedt, Al	31636	ACK 01

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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
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
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

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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
H Att, Janice	51085	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
H Beattie, Jane	51562	ACK 01
H Wolverton, William	51017	P&N 06, SER REV 04, SER WILD 01
H., Paulele	44141	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
H. Reinertsen, Mary	51309	P&N 06
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
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
Harte, Mary	43019, 51133	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01

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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 WILD 44, BIO WILD 45, BIO WILD 46, COOP 01, COOP 03, DATA 05, DATA 17,

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Hensey, Chandira	43967	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
<i>Heuker Bros, Inc</i> Heuker, Tim	52044	P&N 06, SER H&S 04, SER LAND 06, SER REV 08
Hiatt, Ettus	51141	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
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

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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
<i>National Wildlife Refuge Association</i> Hirsche, Evan	31763	PAA 03, PAA 26, REG 08
<i>National Wildlife Refuge Association</i> 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
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
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

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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, Tc	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
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

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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
Isbell, Linda	31606	BIO WET 01, P&N 02, SER LAND 01, SER REV 04, SER SER 03, SER WILD 08
J Widman, Nancy	44229	ACK 01
J. Smith, Jeffrey	51059	BIO BIO 01, P&N 06, SER REV 04, SER WILD 01
J. Ward, Michael	44257	BIO BIO 01
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
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
<i>ConservAmerica</i> 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

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		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 & 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
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

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		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
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
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

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		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
<i>Belkofski Tribal Council</i> Kenezuroff, Leff	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
Kielman, Laura	51882	BIO BIO 01
Kinder, Dianne	31627	ACK 01
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
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
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
Klubek, Brian	36125, 44075	ACK 01, BIO BIO 01, P&N 06, SER REV 09, SER WILD 01

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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
<i>The Wildlife Society</i> 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
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

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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
<i>Belkofski Tribal Council</i> Kuzakin, Simeon	52035	ACK 01, HIST 04, P&N 08, REG 24, SER CUL 02, SER H&S 04
<i>Belkofski Tribal Council</i> 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, 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
Kuzia, Jennifer	80073	ACK 01

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Kyler, Joan	44286	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
L Nowak, Bruce	44074	BIO BIO 01, P&N 06, SER REV 04
L. Baldwin, Robert	51980	SER LAND 01, SER WILD 01
L. Benford, Alan	44190	REG 02
L. Owens, Debra	51823	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
L. Wells, Susan	44341	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
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
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

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Le Roux, Philip	36212, 44198	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 01
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, 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
Lee Kohler, William	51487	ACK 01
Lee Laplante Sharron	51733	ACK 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
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

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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
Louise Mutch FSPA, Mary	44235	BIO BIO 01, 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
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
Lyke, Linda	50992	SER WILD 01
Lyman, Mike	51755	ACK 01
Lynch, Cindy	51330	BIO BIO 01, P&N 06, SER LAND 01, SER

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		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
M. Cobb, Sandra	51157	BIO BIO 01, SER LAND 01, SER REV 04, SER WILD 01
M. Henzi, Bernadette	51734	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
M. Macdonald, Angus	44316	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Mabary, Brian	53099	BIO BIO 01, SER REV 04
Mac Nish, Robert	37427	P&N 06, 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
Mayor, Mack, Henry	51918	HIST 01, P&N 03, P&N 08, PAA 12, SER EJ 01, SER LAND 11
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,

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		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, Memphis	62885	ACK 01
<i>Aleutians East Borough</i> 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, 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

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		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, Jr., Joseph	62880	ACK 01
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
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
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

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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
Maron-Friend, Judith	43993	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
<i>Old Harbor Native Corporation</i> Marrs, Carl	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	31699, 46430, 51983	BIO BIO 01, P&N 01, P&N 02, P&N 06, REG 02, SER REV 09, SER WILD 01
Martin, Drew	51651	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, 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
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

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		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
<i>Ocean Run Seafood</i> McDonald, John	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
<i>Qagan Tayagungin Tribe</i> McGlashan, Rayette	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
Mcmurtry, Rian	52304	REG 03
McNamara, Karla	53063	BIO BIO 02
<i>Nelson Lagoon Tribal Council</i> McNeley, Mark	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

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		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
<i>Alaska Wilderness League</i> 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
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
<i>Northern Alaska Environmental Center</i> 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,

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		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
<i>Impulse Media Services LLC</i> Miner, James	51007	P&N 01
<i>Moss Cape LLC</i> Miner, James	51236	ACK 01
Mink, Dan	51164	SER WILD 01
Minn, Beverly	44294	ACK 01
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
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

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Morgan, Faith	51298	ACK 01
<i>US Army Corps of Engineers</i> Morgan, Shannon	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, 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
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
mun, donald	51341	SER WILD 01
<i>U.S. Senate</i> Murkowski, Lisa	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
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
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
Nelligan, Amber	66531	ACK 01
Nelson, Ellen	51701	SER WILD 01, SER WILD 02
Nelson Lagoon and False Pass, Public Meeting	52023	BIO WILD 01, IAM 01, SER WILD 10
Nenon, Eloise	51795	ACK 01

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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
<i>Wilderness</i> Nickas, George	<i>Watch</i> 31763	PAA 03, PAA 26, REG 08
<i>Wilderness</i> Nickas, George	<i>Watch</i> 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

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		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
<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	31763	PAA 03, PAA 26, REG 08
<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
Noggle, Lucille	51900	SER REV 04, SER WILD 09
Nowack, Kenneth	53107	SER REV 04
Noyes, Harry	67444	ACK 01
Nuesch, Raymond	44258	ACK 01
O'Connell, Kathleen	52849	BIO BIO 02
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
O'Neill, Fran	51422	SER WILD 02
O'Reilly, Phyllis	44118	ACK 01
O'Rourke, Marie	51203	ACK 01
O'Sullivan, Katherine	51596	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 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

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Oda, John	51947	ACK 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
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
Olson, Sherry	51494	SER WILD 02
Orchard, Karen	51289	SER WILD 02
Orcholski, Gerald	44004	P&N 06, SER REV 04, SER WILD 01
Ornelas, Karen	35607, 44161	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER REV 09, SER WILD 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
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
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
P Kampwirth, Gregory	51971	ACK 01
P. Heyneman, John	44180	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

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Paleias, Linda	44078	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
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
Patricia, Davis Chang	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

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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
<i>Aleutian Pribilof Islands Association, Philemonof, Dimitri</i>	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
<i>Resource Development Council</i> Portman, Carl	33126	ACK 01, P&N 03, P&N 08, P&N 13, PAA 01
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

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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
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, Jean	31741	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
Puca, Robert	51600	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Purdy, Bruce	51016	ACK 01
Quirk, Joseph	51035	SER REV 04, SER WILD 01
R. Byerley, James	51125	SER WILD 01
R. Price, Lori	51472	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
<i>Defenders of Wildlife</i> Rappaport Clarke, Jamie	31763	PAA 03, PAA 26, REG 08
Raridon, Terri	53139	BIO BIO 02
Rasich, Sandy	51518	ACK 01
<i>Friends of Alaska National Wildlife</i>	31763	PAA 03, PAA 26, REG 08

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<i>Refuges</i> Raskin, David		
<i>Friends of Alaska National Wildlife Refuges</i> 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
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
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
<i>United States Environmental Protection Agency</i> Reichgott, Christine	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, Marilyn	42356, 44059	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
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
Revilla, Oscar	51442	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Reynolds, Jim	53095	SER REV 09

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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
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
<i>Wildlands</i> Rissen, Adam	<i>CPR</i> 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
<i>Sierra</i> Ritzman, Dan	<i>Club</i> 51760	BIO T&E 01, BIO WET 02, BIO WET 04, BIO WET 07, BIO WET 08, BIO WILD 01, BIO

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		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
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

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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
<i>Aleutians East Borough</i> Rowley, Dan	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
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
Rutkowski, Robert	31704	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
S, Svetha	51428	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
S., Etherton	44144	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
S. Kestler, Carol	51276	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
S. Luther, Doris	51373	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

Commenter	Submission ID	Comments
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
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

Commenter	Submission ID	Comments
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
SEARLE, KERRY	51716	SER WILD 01
Searles, Barbara	31635	ACK 01
<i>Sierra Club</i> Sease, Debbie	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

Commenter	Submission ID	Comments
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
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
<i>Cook</i> Shavelson, Bob	<i>Inletkeeper</i> 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,

Commenter	Submission ID	Comments
		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
<i>Alaska Wilderness League</i> Shogan, Cindy	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
Siegmann, Eric	31683	BIO BIO 01, P&N 06, SER LAND 01, SER WILD 01
Silkey, Uly	44340	SER WILD 01
Silva, Will	51521	ACK 01, SER LAND 01, SER REV 04
Simon, Carol	51908	ACK 01
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
<i>League of Conservation Voters</i> 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
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

Commenter	Submission ID	Comments
Smith, Brian & 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, Jeff	51795	ACK 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, 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
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

Commenter	Submission ID	Comments
		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
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
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

Commenter	Submission ID	Comments
		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
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
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

Commenter	Submission ID	Comments
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
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
<i>Alaska Crab Coalition</i> Thomson, Arni	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
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

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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
<i>Alaska Native Health Board</i> Unok, Alberta	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 Velson, Nathan	52370	REG 03
Van Vliet, Mary	51011	BIO BIO 01, P&N 06, SER LAND 01, SER

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		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
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

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Wallis, DeAnne	44216	ACK 01
Walter, G. Richard	37415	BIO BIO 01, P&N 06
<i>USGS</i> Ward, David	51934	BIO FISH 05, BIO WILD 10, BIO WILD 19, EDI 01, PAA 13, SER ROAD 11
Ward, Matin	51680	ACK 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
<i>Audubon</i> Warnock, Nils <i>Alaska</i>	31763	PAA 03, PAA 26, REG 08
<i>Audubon</i> Warnock, Nils <i>Alaska</i>	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
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

Commenter	Submission ID	Comments
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
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
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
Weyhrich, Patty	51206	ACK 01
Whitaker, Gene	49003, 51412	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Whitaker, Gene	69115	ACK 01
Whitehead, Carole	51750	BIO BIO 02
Whitlow, Scott	77301	ACK 01
Whitney, Stephen	100683	ACK 01
<i>The Wilderness Society</i> 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
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

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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
Wiebe, Albert	37410	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
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
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
<i>American Rivers</i> 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
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
<i>World Wildlife Fund</i> 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

Commenter	Submission ID	Comments
		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
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
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
Wormley, Peter	44014	SER WILD 01
Wouk, Kari	31605, 50466	BIO BIO 01, P&N 06, SER REV 09, SER WILD 01
Wulfsohn, Aubrey	43929	BIO BIO 01, P&N 06, SER LAND 01, SER REV 04, SER WILD 01
Wurtz, Stephen	44239	ACK 01

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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
Zellmer, Cheryl	43921	ACK 01
Zenker, Elisabeth	51244	ACK 01, SER LAND 01, SER REV 04, SER WILD 01

Commenter	Submission ID	Comments
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
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 B

Statements of Concern for Form Letters

Organization	SubmissionText	SOC
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>	<p>BIO BIO 01, P&N 06, SER REV 09, SER WILD 01</p>
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 it's 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 quantity within the Refuge. Further, this is a solution in search of a problem.</p>	<p>P&N 01, P&N 02, REG 02, SER REV 09, SER WILD 01</p>

	<p>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	<p>I support the no action alternative.</p>	ACK 01
King Cove Petitions	<p>Dear Secretary Saslazar Road Petition in favor of a Road to Cold Bay</p>	ACK 01