



## COMMENTS TO THE DEPARTMENT OF THE INTERIOR REGARDING THE PROPOSED LAND EXCHANGE AND ROAD THROUGH THE IZEMBEK NATIONAL WILDLIFE REFUGE ON THE ALASKAN PENINSULA

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My name is Desiree Sorenson-Groves, Vice President of Government Affairs for the National Wildlife Refuge Association, a national not for profit wildlife conservation organization focused on protecting, enhancing and expanding the National Wildlife Refuge System and the landscapes surrounding them. Thank you for the opportunity to present our scoping comments concerning the Environmental Impact Statement (EIS) for the proposed land exchange and road through the Izembek National Wildlife Refuge (NWR) on the Alaskan Peninsula. These comments are offered on behalf of our 40,000 members and 192-affiliate refuge “Friends” organizations.

We appreciate that the U.S. Fish and Wildlife Service (FWS) is forced to complete a new EIS following legislation passed by Congress which calls upon the Service to evaluate the impacts of a road through the biological heart of the Izembek NWR. However, we first point out that this process itself is a waste of taxpayer dollars and valuable Refuge System resources when a previous EIS completed in 2003 found that a road would be devastating to the refuge. While the 2003 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, the science presented just a few short years ago showed the impacts from a road would be devastating.

### **A Solution in Search of a Problem**

In 1998, King Cove residents argued they lacked adequate access to medical and airport facilities and in response, Congress allocated \$37.5 million for medical and airport improvements and a state of the art hovercraft that has successfully provided rapid medical evacuations every time it has been called to do so – AT LEAST 35 times since it became operational. Aleutians East Borough officials agree stating that the hovercraft is “*a lifesaving machine*” and “*it is doing what it is supposed to do*” (Mayor Stanley Mack, Aleutians East Borough (AEB), March 13, 2008). Congress already solved this problem and further debate of this boondoggle – including this EIS – is a waste of time and taxpayer dollars at a time when our national resources are stretched far too thin as it is.

### **Devastating Impacts to Wildlife**

Construction of a road through the narrow isthmus between the Kinzaroff and Izembek Lagoons would have devastating impacts on more than half a million Pacific brant, emperor geese, swans and other wildlife, resulting in fragmentation, disturbance, and pollution. The new EIS must address the impacts from the proposed road including: road construction, sediment run-off and watershed impacts, pollution, road avoidance and habitat fragmentation. The EIS must also address the current and projected impacts to the region from climate change and how these



impacts will be magnified by the development of a road. The species that utilize the Izembek NWR are already coping with impacts from climate change, the FWS must analyze how another stressor, the road, will impact wildlife already under siege.

With over 98% of the Pacific black brant population as well as Steller's eiders and tundra swans dependent on the refuge - specifically the eel grass beds which brant gorge on before their non-stop journey to Mexico – the FWS must thoroughly analyze the impact to the eel grass beds themselves.

### **Precedent Setting De-Designation of Wilderness**

As the FWS creates the EIS, they should 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, where by definition humans leave no mark and is 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 National Wildlife Refuges, but National Parks, Forests and other federal lands. Further, the principles established in the “National Wildlife Refuge System Improvement Act of 1997” would be reversed.

Under the Improvement Act, National Wildlife Refuges are managed under strict guidance from Congress, which states that nothing can occur on a refuge if it is not “compatible” with wildlife. We call upon the FWS to conduct a compatibility determination as is required under the Refuge Improvement Act.

### **Not in the Public Interest**

While the King Cove Corporation and the State of Alaska have offered up lands in exchange for a road corridor through the heart of the refuge, these lands are of significantly lesser conservation value and that alone is reason enough to find the proposal not in the public interest.

This road would cost American taxpayers additional millions of dollars for building and maintenance costs – on top of the already appropriated \$37.5 million. The 10.4 miles of road already constructed as part of the hovercraft initiative cost approximately \$26 million. At this pace, fully completing the road as proposed would cost in excess of \$55 million. A cost-benefit analysis of the road that considers the funds already spent to improve transportation in the region from the King Cove Health and Safety Act and includes a comparison analysis of the current transportation system – the hovercraft – should be included.

This is a solution in search of a problem. The people of King Cove have a fast, 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 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.