

**The Wilderness Society • Defenders of Wildlife • National Wildlife Refuge Association
Natural Resources Defense Council • Alaska Wilderness League
Friends of Alaska National Wildlife Refuges • National Audubon Society
National Wildlife Federation • Sierra Club
Center for Biological Diversity • Wilderness Watch**

August 16, 2013

The Honorable Sally Jewell
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Jewell:

We are writing to express our strong support for the decision by the U.S. Fish and Wildlife Service (FWS) to reject the proposed land exchange and road through the heart of the Izembek National Wildlife Refuge and Wilderness. The agency's recommendation in its final environmental impact statement was based on years of extensive study and analysis—a process through which all stakeholders were provided numerous opportunities to participate and express their views in writing and in person.

Construction and operation of this road would be costly, unnecessary, and contrary to the best interest of U.S. taxpayers. It would be a dangerous and unpredictable means to provide emergency medical transportation during the severe winter storms that frequently occur along the proposed route. Furthermore, it would cause significant ecological damage to public land and subsistence resources and set a disturbing precedent for the National Wildlife Refuge System and all lands currently protected under the Wilderness Act.

The Proposed Road Comes at Significant Cost:

According to FWS, the currently proposed gravel road would cost approximately \$22 million to construct and \$1 million per year to maintain. A separate economic analysis estimated that the road through the designated Wilderness would cost American taxpayers approximately \$35 million, with maintenance costs considerably higher than estimated by FWS.¹ This cost is in addition to the \$25+ million taxpayers have already spent to build a section of road from King Cove to the northeast corner of Cold Bay. Costs for the entire road from King Cove to Cold Bay are projected to total \$81.5 million, with the federal portion being \$75.8 million.²

In spite of such expenditures, there would be little or no improvement in the speed and safety of transportation or access to medical facilities. Taxpayers have already paid for a proven, more efficient mode of transport between King Cove and Cold Bay.

¹ Center for Sustainable Economy Economic Analysis: <http://wilderness.org/resource/tws-and-cse-izembek-economic-analysis>.

² The Wilderness Society: http://wilderness.org/sites/default/files/Proposed%20Izembek%20Road%20Costs_0.pdf and Citizens Against Government Waste: <http://swineline.org/?p=7445>.

Taxpayers Have Already Paid \$37.5 Million:

In 1998, Congress appropriated \$37.5 million to address King Cove’s health and safety needs, including modernizing King Cove’s medical facilities and creating a marine link to Cold Bay. With \$9 million of these federal funds, the Aleutians East Borough (AEB) purchased a safe, reliable, and seaworthy hovercraft capable of transporting an ambulance between King Cove and the Cold Bay airport in approximately 20 minutes. The hovercraft performed successfully in each of more than 30 medical emergencies, but AEB halted the vessel’s operation in 2010, citing high operation costs.

History Demonstrates Economic Drivers for the Proposed Road:

The historical record indicates that commercial interests are a primary driver of the road proposal. For example:

- A 1994 resolution by the town of King Cove called for a road but made no reference to health and safety concerns. Instead, the resolution stated that a road would link North America’s largest salmon cannery in King Cove with the airport at Cold Bay, and listed as part of its rationale that the road would have “a major, positive socioeconomic impact on both communities.”³
- In his 1995 State transportation plan, Alaska Governor Tony Knowles expressed support for a “20-mile road between King Cove and Cold Bay on the Alaska Peninsula for transporting salmon to a community with a runway that could handle large planes.”⁴
- At a 2010 public meeting, an AEB assemblyman stated that Peter Pan Seafoods would use the road to transport “fresh product.”⁵
- In 2011, while visiting King Cove, Senator Murkowski stated, “The decades-old push to get the road built between King Cove and the Cold Bay Airport so that we can have greater access for transportation is going to be a critical ingredient in that thriving economic future going out for the next 100 years.”⁶

The record shows that in spite of suggestions to the contrary, commercial interests are a major driver for the road proposal. One cannot assume a road connecting King Cove and Cold Bay would be limited to noncommercial use. The Dalton Highway to the north, which was originally built as a limited-access haul road but was later opened to unrestricted use, serves as a cautionary tale that access restrictions can be eroded.

The Proposed Road Could Cost Lives:

The proposed road would traverse areas of steep slopes and unstable volcanic soils prone to avalanches. Driving time between the two communities is expected to take close to two hours under the best weather conditions, and the road would be totally impassable during frequent icing, blowing snow, and slides that are common on the proposed route. Severe winter storms

³ City of King Cove, Resolution 94-26, 1994.

⁴ T.A. Badger, “Knowles Outlines Plans for State Roads, Ferries,” Daily Sitka Sentinel, June 7, 1995, p. 3.

⁵ U.S. Fish and Wildlife Service, Izembek EIS Public Scoping Meeting – King Cove, AK, 4/29/10.

⁶ Senator Murkowski during a public celebration as reported by Aleutians East Borough, In the Loop, 12/2/11.

and high waves would likely produce serious damage that would close it for long periods of time and result in exorbitant repair and maintenance costs for the life of the road. Dr. Peter Mjos, the former U.S. Indian Health Service Medical Director for the Eastern Aleutians Tribes, recently stated, “Combined with darkness, avalanche conditions, and ice-glazed roads, an attempt to travel the proposed road would be foolish beyond any reason, regardless the emergency or business. Any attempt to maintain the road for travel in such conditions would clearly jeopardize life.”

The Proposed Road Would Harm the Refuge and Wilderness:

The Association of Village Council Presidents, which represents 56 Native villages in Western Alaska, stated serious concerns with the impacts to wildlife, the subsistence way of life, and has formally opposed the proposed road.⁷ On February 5, 2013, FWS determined that the proposed road and land exchange should not go forward, finding that they would irreparably harm habitat and species that the Refuge was established to protect. The proposed road would permanently bisect the ecological heart of the Refuge, fragmenting habitat that is vitally important for wildlife, and would forever diminish the value of this congressionally designated Wilderness. FWS found that the lands offered for exchange would not compensate for these losses, as they would remain in their present state even without the proposed exchange. Furthermore, the State-proposed exchange lands contain no eelgrass and little waterfowl habitat.

FWS determined that the proposed road would have “major effects” on Brant, Emperor Geese and Tundra Swans.⁸ Increased human access, hunting pressure, and disturbance would also cause displacement from feeding and/or nesting areas. Hundreds of thousands of waterfowl and shorebirds, including threatened and endangered species, and numerous mammals and fishes depend on the wetlands, tundra, streams, and tidal areas to reproduce and feed. Nearly the entire population of Pacific Black Brant stop at the refuge during their annual migration to feed on the largest eelgrass beds in North America, which would be jeopardized by the proposed road and ensuing disturbance by vehicular traffic. The migrating Brant are an important subsistence resource for dozens of villages across western and northern Alaska.

We are sensitive to the needs of the King Cove residents, but the road is not the best solution for their health and safety concerns as it would not provide year-round access to emergency medical care. The frequent, intense winter storms with blizzards and howling winds that characterize this area would make it nearly impossible and extremely unsafe to travel by road for much of the year, in addition to creating a monumental and costly task of keeping the road open. Taxpayers have already paid \$37.5 million to upgrade King Cove’s medical facilities, purchase a state-of-the-art hovercraft, and build a 17-mile road and launch facilities. We have repeatedly proposed more affordable and effective options, such as: stationing a Coast Guard rescue helicopter in Cold Bay year-round rather than only part of the fishing season, and AEB recently passed a resolution⁹ in support of a permanent Coast Guard presence; recruiting a full-time physician for the state-of-the-art King Cove Medical Clinic; and operating an all-weather ferry that, in a

⁷ Association of Village Council Presidents, Letter to Secretary Jewell, May 6, 2013.

⁸ The U.S. Fish and Wildlife Service’s Izembek National Wildlife Refuge Land Exchange/Road Corridor Final Environmental Impact Statement, p. 2-64.

⁹ Aleutians East Borough Resolution 13-19, 2/19/13: http://www.aleutianseast.org/vertical/sites/%7BEEDABE05-9D39-4ED4-98D4-908383A7714A%7D/uploads/RES_13-19.pdf.

February 2012 letter to the U.S. Army Corps of Engineers, AEB stated was being explored as an alternative in the event that the road is ultimately denied.

The proposed road would be harmful to the Izembek Refuge and Wilderness and the American public. It would fail to provide the emergency medical transportation desired by the people of King Cove, and it would be extremely costly for taxpayers in a time of great financial strain and many pressing national needs. Further, the proposed road is incompatible with the management and purposes of the Izembek National Wildlife Refuge. The Refuge was established to protect wildlife and habitat for the benefit and enjoyment of all Americans, and we urge you to sign the record of decision rejecting the road as soon as possible.

Sincerely,

Jamie Williams
President
The Wilderness Society

Jamie Rappaport Clark
President
Defenders of Wildlife

David Houghton
President
National Wildlife Refuge Association

Frances Beinecke
President
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Cindy Shogan
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cc: Denis McDonough, White House Chief of Staff
Nancy Sutley, Chair, White House Council on Environmental Quality
Mike Connor, Acting Deputy Secretary, U.S. Department of the Interior
Rachel Jacobson, Acting Assistant Secretary for Fish, Wildlife and Parks, U.S. Department
of the Interior
Kevin Washburn, Assistant Secretary for Indian Affairs, U.S. Department of the Interior
Dan Ashe, Director, U.S. Fish and Wildlife Service
Pat Pourchot, Special Assistant for Alaska Affairs, U.S. Department of the Interior
Jim Kurth, Chief, National Wildlife Refuge System, U.S. Fish and Wildlife Service
Geoff Haskett, Alaska Regional Director, U.S. Fish and Wildlife Service