



U.S. FISH AND WILDLIFE SERVICE

IZEMBEK NATIONAL WILDLIFE REFUGE PROPOSED LAND EXCHANGE/ROAD CORRIDOR ENVIRONMENTAL IMPACT STATEMENT NEWSLETTER

ISSUE NO. 2 – OCTOBER 2010

This is the second in a series of newsletters concerning an Environmental Impact Statement (EIS) for a proposed land exchange for the purpose of constructing a road through Izembek National Wildlife Refuge. It is being mailed to Federal, state and local agencies; elected and appointed officials; Alaska Native groups; other interested organizations; and individual citizens to inform people about the EIS project. This and subsequent newsletters can be found on the project website at <http://izembek.fws.gov/eis.htm>

Project Update

In the Omnibus Public Land Management Act of 2009 (the Act), Congress directed the Secretary of the Interior to prepare an Environmental Impact Statement (EIS) under the National Environmental Policy Act (NEPA) to conduct an analysis of a proposed land exchange with the State of Alaska and the King Cove Corporation, including the potential construction and operation of a road between the communities of King Cove and Cold Bay, Alaska. The Act also requires that the EIS contain an evaluation of a specific road corridor through the Izembek National Wildlife Refuge that is identified in consultation with the State of Alaska; the City of King Cove, Alaska; and the Agdaagux Tribe of King Cove, Alaska. The road corridor will be analyzed through the entire refuge, including both Wilderness and non Wilderness areas. The U.S. Fish and Wildlife Service (Service) is the lead agency for preparing the EIS. The Army Corps of Engineers, the State of Alaska, the Aleutians East Borough, City of King Cove, the Agdaagux Tribe of King Cove, the Native Village of Belkofski, the King Cove Corporation and the Alaska Migratory Bird Co-Management Council are cooperating agencies. The U.S. Environmental Protection Agency and the National Marine Fisheries Service were invited to be cooperating agencies but declined a formal role. The Department of Transportation-Federal Highways Administration Western Federal Lands Highway Division is determining their role in the EIS process.

This newsletter is intended to:

- Provide a summary of scoping comments.
- Describe the next steps of the EIS process.

Scoping is a formal process intended to reach out to all interested parties early in the development of an EIS to identify areas of concern associated with the proposed activity, as required by NEPA. The scoping process provides opportunities for people potentially affected by the project to express their views and concerns, and ensures that all substantive issues are fully addressed during the EIS process.

Public Scoping Summary

We held public scoping meetings in the following locations:

Anchorage – March 4, 2010
Washington DC – March 11, 2010
Sand Point – April 26, 2010
Cold Bay – April 27, 2010
Nelson Lagoon – April 28, 2010
False Pass – April 28, 2010
King Cove – April 29, 2010



U.S. Fish and Wildlife Service Refuge Supervisor Mike Boylan addresses the attendees at the King Cove scoping meeting.

We received scoping comments verbally and in writing through discussion, testimony, fax and electronic means. The scoping period began on August 6, 2009 and ended April 30, 2010. Comments received through May 21, 2010 are summarized in this document. The planning team will use these comments to refine the proposed alternatives for the Draft EIS.

Issues Identified During Scoping

During the scoping period, we received a total of 31,568 submissions, containing 640 substantive comments. From these submissions 149 Statements of Concern were developed to summarize the range of scoping comments.

Comments and concerns were organized into five broad issue groups that examined 1) the NEPA process (permits, the EIS, Consultation and Coordination); 2) Purpose and Need for the Action; 3) the Proposed Action, Alternatives and Mitigation Measures; 4) the Affected Environment, Environmental Consequences and potential Direct and Indirect and Cumulative impacts; and 5) a general issue group for data and available information and submissions without substantive comments.

The most common issues identified during scoping include: concerns regarding the NEPA process, regulatory compliance, the proposed action and potential alternatives; the purpose and need of the proposed action; declassification of wilderness; and potential impacts to biological resources, in particular to wetlands and waterfowl. Issues and statements of concern analyzed from the scoping comments are summarized below.

Issues by Group	Summary of Statements of Concern
Process: NEPA, Permits, this EIS, Consultation and Coordination	<p>Regulatory: A variety of issues including the formation of the Izembek National Wildlife Refuge; Alaska Claims Settlement Act; Direction from Omnibus Public Land Management Act of 2009; Wilderness designation; Wilderness requirements; compliance with NEPA, ESA, and other legislation.</p> <p>Public Involvement: Stakeholder engagement and identification included the desire for local residents to participate in the process by having the opportunity to review and provide comments during the EIS process.</p>
Purpose and Need	<p>Concern was expressed that there is not a need for the proposed action as the issue of transportation for medical emergencies has been solved by use of the hovercraft. Others were concerned that the hovercraft has not solved the issue of safe and reliable transportation and that a road is the only solution. There is need for a clear and concise purpose and need statement as required by NEPA and NEPA compliance.</p>
Proposed Action, Alternatives, and Mitigation Measures	<p>Some expressed support of the proposed action, while other supported a no action alternative. Continued use of the hovercraft operation; subsidizing the hovercraft, construction of a small boat harbor in Cold Bay to facilitate hovercraft use; improvements to the dock at Cold Bay to support hovercraft operations; selecting the least environmentally damaging practicable alternative; use of a helicopter for medical evacuations; and construction of a hospital at King Cove. Other concerns were associated with road construction, operations, traffic volumes, and long-term costs of various proposed alternatives. A variety of mitigation measures were suggested such as design considerations, and enforceable measures to avoid or minimize impacts of the proposed alternative and road construction.</p>
<p>Affected Environment: Comments about each resource</p> <p>Environmental consequences: potential direct, indirect and cumulative impacts.</p>	<p>General: Concerns about impacts to the biological environment from the construction and long-term impacts of a road and potential impacts to fish, wildlife, waterfowl; fragmentation and loss of habitat; impacts from construction of stream crossings and effects on habitat including eel grass; impacts from vehicle and wildlife collisions; effects of increased access on wildlife; long-term impact evaluation and issues that should be evaluated in a cumulative impacts analysis. Evaluation of the fill required for road construction and associated direct and indirect impacts to ecological values was recommended for analysis.</p> <p>Fish: salmon habitat and Essential Fish Habitat including impacts to spawning and passage as a result of proposed road construction.</p> <p>Threatened and Endangered Species: The need to address the potential impact to threatened and endangered terrestrial and marine species and their habitat according to the Endangered Species Act and the Marine Mammal Protection Act. The EIS should consider particular impacts to Steller's eiders, black brant, emperor geese and dunlin.</p> <p>Vegetation: How road dust could impact adjacent vegetation and habitats (such as eel grass beds) as well as the existing gravel road network from Cold Bay to the shores of Izembek Lagoon.</p> <p>Wetlands and Aquatic Communities: How the EIS should evaluate effects on wetlands and aquatic communities from the proposed road as well as the existing gravel road access from Cold Bay. Concern was expressed that this evaluation needs to be in sufficient detail that the U.S. Army Corps of Engineers will be able to make its required findings under a Section 404 application and compliance with other statutes and guidance.</p> <p>Wildlife: Several expressed concerns for the various impacts to wildlife that could occur as a result of the proposed land exchange and road construction. Species that were addressed include: brown bear, caribou, waterfowl, migratory birds, and marine species. Concern was also expressed regarding the impacts to wildlife from the introduction of invasive species.</p> <p>Physical Resources: The need to conduct analysis of the current and projected impacts to the region from climate change and how these impacts could be confounded by the development of a road; cumulative impacts of the land exchange and proposed road in the context of proposed oil and gas development in and around lands and waters of the Izembek National Wildlife Refuge and Izembek Lagoon; regional extent and international extent of impacts to the physical resources of the region; and impacts of road construction, sediment run-off, watershed impacts and pollution.</p> <p>Climate & Air Quality: Provide a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards, and criteria pollutant non-attainment areas in the road corridor and surrounding areas; and disclosure of greenhouse gases emitted by the project be included in the EIS.</p> <p>Environmental Contaminants & Ecological Risk Assessment: Concern for how pollutants from the proposed road could impact the surrounding ecosystem. EIS should address potential direct, indirect and cumulative impacts of hazardous materials from construction of the project, analyze risks involving possible accidental releases of hazardous materials, and describe mitigation and emergency response measures.</p> <p>Hydrology: The EIS should describe all waterbodies and stream crossing and potential impacts (including specific pollutants) to surface, subsurface, and ground water in the project area.</p> <p>Socioeconomic Resources: A cost benefit analysis should be conducted; discuss issues with road maintenance; benefits to the local communities from a road; potential impacts of the land transfer; and concerns expressed regarding road siting, location, safety and maintenance.</p> <p>Archeological/Cultural Resources: Impacts to historic properties and cultural resources should be</p>

<p>Affected Environment: Comments about each resource</p> <p>Environmental consequences: potential direct, indirect and cumulative impacts.</p>	<p>considered in an orderly and systematic manner, in full consultation with all concerned parties.</p> <p>Environmental Justice: The EIS should disclose what efforts were taken to ensure effective public participation and to meet environmental justice requirements consistent with Executive Order 12898.</p> <p>Health and Safety: The challenges were described facing the community for traveling in and out of King Cove during inclement weather. One concern is in support of the road for health and safety reasons while another concern was expressed that the road would not create a safer or more efficient transport and impacts associated with the road could lead to littering, abandoned vehicles, violation of traffic laws; including speeding and drunk driving.</p> <p>Health Impact Assessment: Concern expressed that a road between the two communities may encourage the use of illegal drugs.</p> <p>Land Use, Public Use, Recreation, Visual Resources: Concern about impacts on recreational activities; increase in legal and non-legal access; compatibility of alternatives with land management objectives; impacts to scenic, wildlife, visual opportunities for solitude and primitive recreation; and existing trail usage.</p> <p>Public Revenue and Fiscal Considerations:</p> <p>Expressed concern that the current EIS process is a waste of taxpayer money and that millions of dollars have already been provided to alleviate the problem of safe transportation. Concern was expressed as to who would provide funds for year-round maintenance and operation costs of the road. Another concern describes how the proposed road would be good for the economy and quality of life through jobs (e.g. snow removal) and commerce (e.g. access to gravel, shipping fresh product between communities). Concern was expressed that he EIS needs to address financial connections between the oil industry seeking leases in Bristol Bay and proponents of the road across the peninsula.</p> <p>Road Design, Bridges, Transportation, Planning and Transportation Systems (air, water, and road): Expressed concern regarding the width of the road corridor and how the existing road that runs north of Cold Bay through Izembek National Wildlife Refuge would be affected by the exchange and how it would be connected.</p> <p>Subsistence: The EIS should evaluate effects of the land exchange and construction of the proposed road on subsistence in relation to impacts from subsistence use, access, and management. The benefits of the road to the communities of Cold Bay and King Cove need to be evaluated against the impacts to natural resources and the subsistence culture of Alaska and the rest of the west coast. The EIS should gather and analyze traditional knowledge on subsistence use patterns and disclose historical information compiled on subsistence ORV use within the Izembek National Wildlife Refuge.</p> <p>Wilderness: Concerns about impacts that the proposed land exchange and proposed road could have on the wildlife and wilderness values of the Izembek National Wildlife Refuge and impacts to tourism from loss of wilderness. Concern was expressed that declassification of wilderness will have an effect on wilderness across the nation. A comparative evaluation of wilderness and lands selected for proposed for exchange was recommended.</p>
<p>General</p>	<p>Data and Available Information: Concern that highlights studies, reports, and sources of information recommended for review by the Service.</p> <p>Comment Acknowledged: Developed for submissions without substantive comments and duplicated comments.</p>

Government-to-Government Consultation

Government-to-government consultation is a separate process that occurs in addition to scoping, and involves consultation with affected federally-recognized tribal governments. The Service initiated government-to-government consultation with the following Tribes:

- Agdaagux Tribe of King Cove
- Native Village of Belkofski
- Chevak Native Village
- Native Village of False Pass
- Native Village of Hooper Bay
- Native Village of Nelson Lagoon
- Newtok Village
- Native Village of Paimut
- Pauloff Harbor Village
- Qagan Tayagungin Tribe of Sand Point
- Native Village of Scammon Bay
- Native Village of Unga

We sent letters to Federally Recognized Tribes on June 16, 2010, stating that public scoping recently occurred and the Service would be glad to conduct separate meetings to explain the proposal and hear their thoughts. The letters asked if the tribes had any thoughts on the topics of cultural, traditional, or religious sites that could be affected; any known graves or archaeological sites in the project area; any formal tribal positions on the proposal; any information on fish and wildlife that may be affected and any other input the tribe would like to contribute. The Service met with both Agdaagux and Belkofski Tribes in August 2010. We welcome the local knowledge that residents can provide and value all comments.

Next Steps

The EIS is now in Step 3 of the NEPA process, Analysis of the Alternatives. This step will include refining the alternatives that meet the project purpose and need for consideration in the Draft EIS. This step will ensure that the range of

alternatives is analyzed as well as the potential impacts of each alternative. After the preliminary analysis, the Service will select a preferred alternative (Step 4).

Once the Draft Izembek Land Exchange/Road Corridor EIS is complete (Step 5), the document will be released to the public for a review period of at least 60 days. During the review period, the Service will conduct Tribal Consultation and public hearings to accept comments on the Draft EIS (Step 6). Public testimony, written comments, and electronic comments will be accepted during the review period.

Step	Steps in the NEPA Process
1	Federal Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) August 6, 2009 Revised Federal Notice of Intent (NOI) to Announce the Public Scoping Meetings February 24, 2010
2	Scoping Scoping Period: August 6, 2009 to April 30, 2010 Public Scoping Meetings: March 4 to April 29, 2010 Scoping Report: October 2010
3	Analysis of Alternatives
4	Service selects preferred alternative
5	Issue Draft EIS Estimated release: Summer 2011 Available for public review
6	Public Hearing on Draft EIS Estimated Summer 2011
7	Public Comment Review and Synthesis Comment Analysis Report Available, Estimated Fall 2011
8	Respond to Comments/Prepare Final EIS Estimated Spring 2012
9	Issue Final EIS Available for minimum 30-day public review
10	Record of Decision/Public Interest Finding Public statements of agency decisions Estimated: Summer 2012

Stay Involved

Visit the website for on-going project information:

<http://izembek.fws.gov/eis.htm>

Information about prior steps in the process is also available on the project website. For example, the presentation for the scoping meetings and the first newsletter are available for reference. Our next formal request for public comment will follow the release of the Draft EIS.

We encourage you to take an active part in the Izembek Land Exchange/Road Corridor EIS. The purpose of this newsletter is to keep you informed and allow you every opportunity to voice your opinion regarding this important project. If you have any questions, comments, or requests for more information please contact:

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