

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

November 2, 2012

The Honorable Ken Salazar, Secretary
Department of the Interior
1849 C Street, NW
Washington, DC 20240

RE: Izebek National Wildlife Refuge – Public Interest Determination for the Proposed Land Exchange/Road Corridor

Dear Secretary Salazar:

The undersigned organizations strongly oppose the proposed land exchange and road corridor through Alaska's Izebek National Wildlife Refuge and Wilderness Area. As you prepare to make the public interest determination required by the Omnibus Public Land Management Act of 2009, we wish to draw your attention to the many failings of this proposal that clearly demonstrate it is **not** in the public interest.

The proposed road corridor and land exchange would add more than \$24 million to the exorbitant bill already paid by the American taxpayers. For years, Aleutians East Borough (AEB) has sought to build the proposed road, purportedly to allow for emergency medical evacuations from King Cove to an all-weather airport in Cold Bay. In 1998, Congress provided an alternative solution through the King Cove Health and Safety Act, which appropriated \$37.5 million for AEB to improve King Cove's medical facilities and create a reliable marine link to Cold Bay. The current proposal would require the American taxpayers to once again foot a hefty bill – this time in excess of \$24 million.

The problem has already been successfully addressed. The funds appropriated under the King Cove Health and Safety Act allowed AEB to purchase a \$9 million seaworthy hovercraft, capable of transporting an ambulance to Cold Bay in as few as 20 minutes, even with wave heights of up to 10 feet and winds of over 45 miles per hour. The hovercraft began operating in 2007 and performed successfully in each of the more than 30 medical evacuations for which it was used. Despite this total success, AEB suspended operations in 2010, claiming that it couldn't afford to keep the hovercraft in service and that the vessel did not work properly in winter weather. In spite of these claims, AEB recently equipped the hovercraft with de-icing capabilities, moved it to nearby Akutan, and committed to pay for its operation in the treacherous seas between Akutan and Akun airport for a period of 20 years in order to transport Trident Seafood plant personnel.

A road through the unstable terrain and severe weather conditions of the Izembek isthmus would threaten public health and safety. The proposed road would traverse fragile rolling tundra dotted with wetlands that are prone to high snowdrifts, as well as areas of steep slopes and unstable volcanic soils prone to avalanches. Travel time between the two communities is expected to take more than two hours in the best circumstances, but the frequent icing, high winds, fog, reduced visibility, and snow squalls that are common to the region would make the road impassable during much of the year, as well as lead to exorbitant maintenance and repair costs. Far from being a safe and reliable route for emergency transportation from King Cove to Cold Bay, the road is more likely to delay needed medical attention and put the lives of those who travel it at greater risk.

The additional land that FWS would gain from the proposed exchange cannot compensate for the high-quality habitat that would be lost and degraded. Izembek Refuge and Wilderness support a diversity of wildlife, including globally significant populations of migratory birds. The proposed exchange lands would neither provide comparable habitat nor compensate for the loss and degradation of the lagoon complex, which comprises the largest eelgrass beds in North America. This issue cannot be resolved on the basis of acreage: no amount of exchange lands offered to FWS can compensate for the unacceptable and irreversible impacts of a road on the unique and productive wildlife habitats that make up the very heart of Izembek Refuge.

A proposed land exchange and road corridor would violate the Department's legal obligation to uphold the ecological integrity of the National Wildlife Refuge System. The National Wildlife Refuge System Improvement Act, which passed by an overwhelming bipartisan majority of Congress in 1997, sets stringent Secretarial stewardship standards by which the Refuge System and its units must be managed. These standards apply to all management decisions affecting Izembek Refuge and must be among the baseline considerations for a public interest determination. In particular, a key provision in the Act that pertains to your determination is the requirement that the Secretary of the Interior “shall ensure that the biological integrity, diversity, and environmental health of the System are maintained for the benefit of present and future generations of Americans.” By including this language in the Act, Congress has already determined that conserving the lands, waters, and wildlife within the units of the Refuge System and maintaining their ecological integrity is in the public interest. The decision regarding the proposed land exchange and road must ensure that these values will be maintained for future generations. Removing the biological heart of Izembek Refuge and punching a road through it can only serve to erode the refuge's—and the Refuge System's—biological integrity, diversity, and environmental health.

This proposal would set a harmful precedent for de-designating Wilderness lands across the nation. Permanent roads and commercial enterprises are expressly prohibited in congressionally designated Wilderness. Therefore, to construct the proposed road, the affected areas must be “de-designated” and removed from the Wilderness System. This end-run around the prohibition against permanent roads in designated Wilderness would set a precedent for de-designating other Wilderness areas when development pressures arise, essentially relegating Wilderness to an ephemeral rather than permanent status. This undermines the purpose and intent of the Wilderness Act, as well as threatens the viability of—and the public's confidence in—the entire Wilderness System.

A careful analysis of the land exchange and road corridor proposal clearly shows that it not only fails to advance the public interest, but in fact leaves the American people much worse off. We urge you to protect Izembek National Wildlife Refuge and spare the American taxpayers from this expensive,

unnecessary, and harmful proposal by determining that a land exchange and road corridor are **not** in the public interest.

Sincerely,

Jamie Rappaport Clark
President
Defenders of Wildlife
1130 17th Street, NW
Washington, DC 20036

Jamie Williams
President
The Wilderness Society
1615 M Street, NW
Washington, DC 20036

Larry Schweiger
President and CEO
National Wildlife Federation
901 E Street, NW, Suite 400
Washington, DC 20004

Frances Beinecke
President
Natural Resources Defense Council
40 West 20th Street, 11th floor
New York, NY 10011

David Yarnold
President and CEO
National Audubon Society
225 Varick Street
New York, NY 10014

Michael Brune
Executive Director
Sierra Club
50 F Street, NW, Eighth Floor
Washington, DC 20001

David Houghton
President
National Wildlife Refuge Association
5335 Wisconsin Avenue, NW, Suite 521
Washington, DC 20015

George Nickas
Executive Director
Wilderness Watch
PO Box 9175
Missoula, MT 59807

Ronald Fowler
President
Blue Goose Alliance
10 S. Circle Road
Edgewood, NM 87015

Cindy Shogan
Executive Director
Alaska Wilderness League
122 C Street, NW
Washington, DC 20001

David C. Raskin, Ph.D.
Past President and Advocacy Chair
Friends of Alaska National Wildlife Refuges
2440 E. Tudor Road PMB 283
Anchorage, AK 99507

David L. Arnold
Executive Director
Northern Alaska Environmental Center
830 College Road
Fairbanks, AK 99701

Valerie Connor
Conservation Director
Alaska Center for the Environment
807 G Street, Suite 100
Anchorage, AK 99501

Kiersten Lippmann
Acting Alaska Director/Conservation Biologist
Center for Biological Diversity
PO Box 100599
Anchorage, AK 99501

cc: Kim Elton, Director of Alaska Affairs, Department of the Interior
Pat Pourchot, Special Assistant for Alaska Affairs, Department of the Interior
Dan Ashe, Director, U.S. Fish and Wildlife Service
Geoff Haskett, Alaska Regional Director, U.S. Fish and Wildlife Service
Jim Kurth, Chief, National Wildlife Refuge System