



February 13, 2025

Submitted electronically via: <https://www.regulations.gov>

U.S Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA  
22041-3803

Re: Draft SEIS for Potential Land Exchange Involving Izembek National Wildlife Refuge Lands; FWS-R7-NWRS-2023-0072

To Whom It May Concern,

Thank you for the opportunity to submit comments on the Draft Supplemental Impact Statement (SEIS) (Docket No. FWS-R7-NWRS-2023-0072) for a potential land exchange between the King Cove Corporation, the State of Alaska, and the U.S. Government to allow the King Cove Corporation to build a single-lane, non-commercial gravel road between the communities of King Cove and the nearby Cold Bay airport through the Izembek National Wildlife Refuge. We, the undersigned, support Alternative 6 in the Draft SEIS to execute the proposed land exchange to facilitate the construction, operation, and maintenance of a noncommercial, single-lane gravel road connecting King Cove to Cold Bay through the Izembek National Wildlife Refuge.

In our view, this issue is one of fundamental rights of access, public safety, and human rights. It should be given the highest priority without further delay. We strongly believe that the proposed road corridor from King Cove to the all-weather airport at Cold Bay is in the public interest and represents a limited and balanced resolution for all stakeholders – in particular the residents of King Cove. This land exchange represents a decades-long effort by the community of King Cove to gain access to the Cold Bay airport to provide public health, access to medical care, and essential services, especially during emergencies when air and sea travel is hazardous or impossible.

Since 1980, at least 20 deaths have been attributed to the absence of a road between King Cove and Cold Bay. Since 2013, King Cove has been forced to endure over 257 medevac rescues. Most occurred in dangerous weather conditions, and many had to be carried out by the U.S. Coast Guard, risking the lives of crews and patients alike. Other alternative options listed in the Draft SEIS, including procuring a hovercraft for King Cove to medevac residents over the water to Cold Bay, have proven unfeasible and unreliable. Cold Bay often sees 15 to 20-foot seas during the winter, making travel extremely dangerous, not to mention docking and transporting sick or injured people up an icy ladder in the snow and wind. Constructing the proposed road would greatly enhance emergency access for the residents of King Cove and provide safer conditions for emergency response personnel.

Importantly, this project can be carried out with minimal environmental impact. Modern construction techniques and mitigation measures can be employed to protect the sensitive ecosystem of the Izembek

National Wildlife Refuge. Construction can be designed to avoid and mitigate significant environmental harm while preserving wetlands, critical habitats, and biodiversity. There are currently 40 miles of existing road in the Izembek National Wildlife Refuge today with no apparent impact on birds or any other wildlife. To connect the communities of King Cove and Cold Bay, only 11 miles are needed to connect already existing roads.

The Izembek National Wildlife Refuge was designated as a federal wilderness by Congress in 1980 through the Alaska National Interest Lands Conservation Act (ANILCA). This designation was made without consultation with the local King Cove Alaska Native people. ANILCA was designed to balance conservation and development while safeguarding the subsistence rights and cultural traditions of Alaska Natives. We ask that you consider the trust relationship that the United States is obligated to uphold with the Alaska Native people when reviewing the need for the proposed road which would allow Alaska Native residents of King Cove to live safely in their ancestral lands.

In addition, since the publication of the Draft SEIS, on November 15, 2024, Executive Order (EO) 14153, *Unleashing Alaska's Extraordinary Resource Potential* was issued on January 20, 2025. It provides, in relevant part that *"the Secretary of the Interior shall exercise all lawful authority and discretion available to him and take all necessary steps to [...] facilitate the expedited development of a road corridor between the community of King Cove and the all-weather airport located in Cold Bay"*. We hope you consider this language, representing the position of the current administration, as you conduct next steps in this Draft SEIS process.

As stated above, this is an access, public safety, and human rights issue. No person should have to face the perilous conditions that King Cove residents must endure to receive emergency and essential medical care. By constructing an 11-mile one-lane gravel road we can finally resolve this issue. Thank you for the opportunity to comment.

Sincerely,



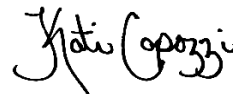
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Tessa Axelson  
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Established in 1975, the **Resource Development Council for Alaska (RDC)** is a statewide business association whose mission is to grow Alaska through responsible resource development. RDC is comprised of individuals and companies from Alaska’s fishing, forestry, mining, oil and gas, and tourism industries. RDC’s diverse membership also includes Alaska Native corporations, local communities, organized labor, and industry support firms. RDC’s purpose is to encourage a strong, diversified private sector in Alaska and expand the state’s economic base through the responsible development of our natural resources.

The **Alaska Chamber** is a non-profit founded in 1953 working to promote a positive business environment in Alaska. The Chamber is the voice of small and large business representing more than 700 businesses, manufacturers, and local chambers across Alaska. Our member companies employ more than 55,000 hardworking Alaskans. The Chamber advocates for a positive investment climate that provides certainty and stability for Alaska.

The **Alaska Support Industry Alliance** is a professional trade organization representing more than 500 companies and 35,000 employees who support the development of Alaska’s oil, gas and mineral resources.

**Alaska Metal Mines (AKMM)** is a professional association formed in 1992 to represent Alaska’s large metal mines and advanced projects. We work to inspire Alaskans to support a growing mining industry that produces essential minerals while prioritizing safe operations, community partnerships, and environmental protection.

**Alaska Miners Association (AMA)** is a professional membership trade organization established in 1939 to represent the mining industry in Alaska. AMA’s more than 1,400 members come from eight statewide branches: Anchorage, Denali, Fairbanks, Haines, Juneau, Kenai, Ketchikan/Prince of Wales, and Nome. Alaska’s miners are individual prospectors, geologists, engineers, suction dredge miners, small family mines, junior mining companies, major mining companies, Alaska Native Corporations, and the contracting sector that supports Alaska’s mining industry.

The **Alaska Travel Industry Association (ATIA)** promotes Alaska as a top visitor destination and works to increase the economic impact of tourism in Alaska while remaining stewards of the state's natural resources, cultures, and unique quality of life.

The mission of **Associated General Contractors of Alaska (AGC)** is to advocate, educate, and promote the construction industry in Alaska.

**Pacific Seafood Processors Association (PSPA)** is a nonprofit trade association representing Alaska seafood processing companies in the policy, regulatory, and legislative arenas since 1914. PSPA is dedicated to supporting and advocating for the Alaska seafood industry and the sustainable use of fishery resources.

**The Alaska Forest Association (AFA)** is Alaska's oldest industry association representing the interests of the forest products industry statewide.

**Associated Builders and Contractors of Alaska (ABC of Alaska)** is a trade association representing over 150 members statewide. Our membership is made up of over 65% contractors, with more than half of those located within the Municipality of Anchorage. ABC provides accredited apprenticeship education and opportunities supporting careers in the construction industry. Our mission is the advancement of the merit shop construction philosophy, which encourages open competition and a free enterprise approach that awards contracts based solely on merit, regardless of labor affiliation.