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TESTIMONY
BEFORE THE HOUSE NATURAL RESOURCES COMMITTEE
REGARDING H.R. 2801, THE IZEMBEK AND ALASKA PENINSULA
REFUGE AND WILDERNESS ENHANCEMENT AND KING COVE SAFE
ACCESS ACT
October 31, 2007

Mr. Chairman and Members of the Committee:

My name is David Raskin, president of the Friends of Alaska National Wildlife Refuges. On behalf of the Friends of Alaska NWRs, I thank you for the opportunity to offer comments about H.R. 2801, the Izembek and Alaska Peninsula Refuge and Wilderness Enhancement and King Cove Safe Access Act. The Friends of Alaska NWRs is an all-volunteer organization that works with the U.S. Fish and Wildlife Service (FWS) to protect and enhance the 16 National Wildlife Refuges in Alaska. Our membership is diverse, including Alaskan sportsmen, educators, business leaders, conservationists, and concerned citizens in cities, towns, and villages. We have regional representatives all around Alaska, including two Alaska Natives who coordinate activities with five of the largest refuges. Our priority programs include rural outreach, in which we send members to villages to work with Native youth in science education camps, and the removal of invasive species that threaten the habitat of many of our refuges. We also conduct community outreach programs to educate the public about the values of wildlife refuges and involve local citizens in working with their local refuges.

I offer this testimony also on behalf of the National Wildlife Refuge Association, whose membership is comprised of current and former Fish and Wildlife staff, more than 140 Affiliate groups nationwide, and thousands of private citizens across the country who support our nation's wildlife refuges.

The Friends of Alaska NWRs strongly opposes H.R. 2801, which includes a proposal to build a road through the biological heart of the Izembek National Wildlife Refuge on the Alaska Peninsula. The proposed road seeks to connect the villages of King Cove (population 807) and Cold Bay (population 80). However, this legislation is a solution in search of a problem. Since the 98-foot Suna-X hovercraft has begun regular service between King Cove and Cold Bay, a viable, operational, and successful link between the two communities now exists. Further, the new medical clinic in King Cove provides an added level of security to deal with medical emergencies.

Background

King Cove is 25 air miles from Cold Bay, site of Alaska's third-longest runway that provides scheduled commercial jet service to Anchorage. However, during inclement weather, the short flight from King Cove to Cold Bay can be dangerous; 11 people have died in accidents flying between these villages since 1979. On the basis of their public safety concerns, residents of King

Cove have sought the construction of a road to Cold Bay since the mid-1990s. Nine miles of this proposed road would cut through the Congressionally-designated Wilderness of the 315,000-acre Izembek National Wildlife Refuge.

Congress addressed the road issue in 1998 after King Cove residents argued that they lacked adequate access to medical and airport facilities. Having decided that a road through the heart of the Izembek refuge would be unacceptably harmful to wildlife and Wilderness, Congress responded by allocating \$37.5 million for medical and airport improvements and a 98-foot, state of the art hovercraft that has already provided 16 rapid and successful medical evacuations to Cold Bay Airport. At a time when millions of American children have no health care coverage whatsoever, it strikes us as unconscionable and wasteful to allocate further taxpayer dollars to address a health care challenge that has already been solved. Further, a road through this majestic, federally designated Wilderness would likely have devastating impacts on wildlife, resulting in habitat fragmentation, disturbance, and pollution.

Izembek NWR – A Haven for Wildlife

The Izembek National Wildlife Refuge was established in 1960 to protect critical habitat for the Pacific black brant. At 417,533 acres, it is the smallest of the 16 Alaskan refuges, and more than 95% is designated Wilderness under the Alaska National Interest Lands Conservation Act. Although the refuge was specifically established to protect almost the entire world population of Pacific black brant, other abundant wildlife includes brown bears, moose, caribou, wolves, seals, seal lions, sea otters, five species of salmon, and numerous species of migratory birds. At the heart of the refuge is a narrow isthmus bordered by Kinzarof and Izembek Lagoons. They contain some of the largest eelgrass beds in the world, on which the Pacific brant and other avian species depend for survival.

More than 98% of the world's Pacific black brant feed voraciously on the eelgrass in the Izembek lagoon in order to fuel up prior to their nonstop, 3000-mile trip to Mexico. The nearby wetlands offer nesting sites for thousands of birds. During migrations, more than a half million birds use this refuge and its sensitive wetlands. The importance of the Izembek refuge was accorded world recognition in 1986 under the Reagan Administration when it became the first wetland area to be designated as a Wetland of International Importance by the RAMSAR Convention. In 2001, it was also designated as a Globally Important Bird Area. Given the remarkable wildlife and habitat values represented in the refuge, a road through the heart of Izembek would run counter to all that it represents.

The FWS has consistently rejected a road through the Izembek Wilderness because of its serious environmental impacts. From 1995-1997, the FWS declined offers from the King Cove Corporation to exchange lands for a right-of-way through Izembek Refuge in order to construct a 26-mile road connecting King Cove and Cold Bay. When road proponents sought legislation in 1997 to approve a road, the FWS objected and stated that a road through key wildlife habitat and designated Wilderness was not in the public interest. A compromise was reached when \$37.5 million was included in the FY 1999 Omnibus Appropriations Act to implement *The King Cove Health and Safety Act*. This legislation funded a road-hovercraft link between King Cove and Cold Bay and improvements to the King Cove Airport and clinic. Following passage of that Act, in 2004 the Army Corps of Engineers completed the *King Cove Access Project EIS* and

recommended construction of a road-hovercraft link between King Cove and Cold Bay, thereby avoiding the Refuge. For comparison purposes, the EIS evaluated the impacts of a road from King Cove to Cold Bay, which was found to have the most significant impacts to wildlife of all six alternatives they had considered.

By early 2006, the Aleutians East Borough (AEB) completed a one-lane 5-mile gravel road from the King Cove airstrip to an interim hovercraft dock in Lenard Harbor for the Suna-X hovercraft. This vessel cost \$8.8 million and can transport up to 50 passengers, an ambulance, and cargo. The permanent hovercraft dock was to be built another 13 miles further – right up to the edge of the Izembek NWR. However, the AEB ran out of money in January 2006 and did not complete the road to the distant hovercraft dock. The road-hovercraft link from King Cove to Cold Bay has been used since late 2006 and has provided 16 successful emergency medical evacuations as of July 2007.

Impacts to Wildlife

Constructing a road through the Izembek National Wildlife Refuge would have numerous negative impacts on wildlife and would degrade the critical wetlands habitat and wilderness quality of the refuge. The isthmus through which the road would be constructed is extremely narrow; standing in the center, one can see the Izembek Lagoon to the north and the Kinzarof Lagoon to the south. Pacific black brant gorge on the eelgrass beds of Izembek Lagoon before their non-stop journey to wintering grounds in Mexico. Birds and wildlife, such as brown bears, travel between the two lagoons, sometimes more than once a day, in search of food exposed by receding tides. Caribou use the isthmus as a wintering ground and as a corridor when traveling to and from wintering grounds beyond the refuge, and brown bear traverse the area to reach their winter dens.

The Refuge Improvement Act of 1997 mandates that in administering a refuge, the Secretary of the Interior, through the Refuge Manager, shall ensure that the biological integrity, diversity, and environmental health of the System are maintained. Under this mandate, a road through the heart of the refuge is incompatible with the mission of the refuge and must be rejected. Road construction, traffic, and maintenance could cause irreversible harm to the eelgrass beds and wetlands that are vital to many migratory birds. Every passing vehicle would flush birds, wasting their valuable energy as they work intensively to build up enough strength and resources for their migration. A road through this isthmus would also disrupt wildlife movement and result in increased animal mortalities. The Department of Interior has repeatedly rejected this proposed road. Only three weeks ago during the October 9, 2007 oversight hearing on the National Wildlife Refuge System Improvement Act, in response to a question about a road proposed through Waccamaw National Wildlife Refuge in South Carolina, FWS Director Dale Hall stated that roads through refuges typically cause problems and do not contribute to the purposes of refuges.

Quantity vs. Quality

H.R. 2801 offers a land exchange in an attempt to buy support for this unwise proposal. In exchange for 206 acres upon which the road would be built, the legislation would provide 61,000 acres to the refuge. At first glance, this might appear to be a beneficial proposal, but the offered lands do not provide comparable habitat value to compensate for the major, irreversible impacts

of the proposed road on fish, wildlife, and wetlands. While these lands may have value to wildlife, we are unaware of any threats that would compromise their integrity. Consequently, even for biological reasons alone, there is no compelling justification for Congress to consider such an exchange.

A Problem Already Solved

Aside from the substantial and tangible threats to wildlife embodied in this proposal, the road proponents ignore the crucial point: Congress solved this problem when it appropriated \$37.5 million in 1998. Despite their expenditure of these funds that met their stated needs, King Cove and AEB officials continue to maintain that this road is necessary for medical emergencies.

When Congress considered and denied a similar proposal in 1998 for a road through the Izembek National Wildlife Refuge, they cited the significant anticipated habitat and wildlife losses described in the Environmental Impact Statement by the Army Corps of Engineers. Instead, Congress appropriated \$37.5 million to fund a road-hovercraft link between the two villages and improvements to the King Cove Airport and clinic. Of the \$37.5 million in federal funds, \$2.5 million was spent to improve the King Cove Medical Clinic and \$9 million was used to purchase the hovercraft that is currently operating successfully between nearby Lenard Harbor and Cold Bay. The remaining \$26 million in American taxpayer dollars was spent to build 15 miles of a planned 17-mile, one-lane gravel road from the King Cove Airport to a hovercraft dock more distant from King Cove and adjacent to the Izembek Wilderness.

The interim hovercraft dock in Lenard Harbor, just five miles from King Cove Airport, has been the launch point for at least 16 successful medevacs aboard the impressive Suna-X, where ailing King Cove residents have quickly and safely reached the Cold Bay Airport. In such cases, the ambulance drives directly aboard the hovercraft for a 20-minute ride across Cold Bay on a cushion of air. The 98-foot-long and 50-foot-wide Suna-X travels at speeds up to 58 mph and can carry 50 passengers and 22 tons of freight, including cars, trucks and an ambulance in case of emergency. As of July 19, 2007, the Suna-X had transported more than 1,090 passengers, 110 vehicles, and 110,000 lbs of freight.

In the event of a medical emergency, traveling all the way around Cold Bay on a 26-mile gravel road could have life or death consequences, particularly in winter when conditions include avalanches, high winds, ice, and blowing and drifting snow. In contrast, the hovercraft can travel in wave heights of up to 10 feet 6 inches and in winds over 45 miles per hour. Historical data indicate that winds exceeding this velocity occur less than 1% of the time. Despite the success of the hovercraft and the exorbitant costs of building and maintaining a road without a clear purpose, King Cove is once again asking Congress to permit and fund the previously denied 9 miles of road through the heart of the Izembek Refuge Wilderness.

A Costly and Challenging Road

The route of the proposed Izembek Isthmus road is through fragile rolling tundra dotted with wetlands and prone to high snowdrifts. The rest of the road traverses areas of steep slopes and unstable volcanic soils prone to avalanches. Gravel is scarce in remote areas of Alaska and must be shipped in, and re-routing and construction delays raised the cost of the already-completed 15 miles of road to \$26 million in 2006. At the rate of more than \$1.73 million per mile, the

additional 9 miles would have cost at least \$15.6 million in 2006 and will be more by the time it could be constructed.

Construction cost alone is adequate justification to reject the proposed road. However, this does not even include the cost of maintenance, which in this harsh climate could be exorbitant. In addition, it does not include the costs of installing and maintaining the required cable barriers on both sides of the one-lane road that would be designed to offer some protection to the refuge wilderness from illegal and damaging off-road vehicle traffic. According to the Washington State Department of Transportation, cable-barrier protectors cost an estimated \$44,000 per mile, with an additional \$2,000-\$5,000 per mile for annual maintenance. That amounts to at least \$400,000 to install the barriers and up to \$45,000 annually to maintain them.

Frequent snowstorms, avalanches, icing conditions, and extreme high tides, coupled with high winds would pose serious dangers for drivers and would be especially hazardous for ill passengers subjected to an arduous and lengthy trip on this rugged and remote road. The claim that a road would improve health and safety totally ignores statistics from other parts of Alaska that show remarkably high rates of fatalities due to inclement weather and hazardous road conditions. According to the Alaska Department of Transportation, motor vehicle accidents in the year 2000 cost Alaska \$475 million dollars. Even when conditions would allow travel, the journey would be slow and dangerous. Contrary to the stated purpose of the road, it is likely that using the proposed road would *increase* dangers and travel time, thereby posing additional health and safety risks to King Cove residents. Although the hovercraft may not operate during the infrequent periods of extremely high winds, the road would be subject to the additional hazards of ice, drifting snow, and poor visibility. Such conditions could make the road impassable and would likely close the Cold Bay Airport to jet traffic, rendering rapid medical evacuation moot.

Transportation in Remote Areas

The Friends of Alaska NWRs understand the difficulties faced when living in such a remote area and the challenges presented by such a harsh environment. Indeed, some of our own members live and have lived in Cold Bay and even more remote parts of Alaska. Many members of the Friends of Alaska NWRs, including myself, have volunteered our time to visit and complete projects at the Izembek NWR. We are familiar with the area, the habitat and wildlife, the weather and terrain, and the problems that confront the citizens of King Cove and Cold Bay. To that end, the Friends of Alaska NWRs have offered to help our fellow Alaskans to obtain needed access to medical services.

If the issue is funding the operation of the hovercraft, we suggest that King Cove and AEB officially request that the State of Alaska maintain the hovercraft just as they do for the vessels of the Alaska Marine Highway System. Instead of spending a substantial amount of State road maintenance funds for an unnecessary, undesirable, dangerous, and ineffective road, it makes more sense to spend far less money to subsidize and maintain a faster and safer mode of transport, just as the State does for marine transportation throughout Southeast, Southcentral, and Western Alaska. If a physician is needed at the King Cove Clinic, that is a different, effective, and less costly problem to solve than to build the proposed road. We have offered to assist the citizens of King Cove to solve that problem.

It is neither fair nor reasonable for the people of King Cove to have received and expended \$37.5 million of American tax dollars that solved their expressed needs for health and safety and then come back again with the request for a road. The Suna-X hovercraft has already demonstrated that it is a successful operational solution to the problems the Aleutians East Borough raised in 1998. Although we recognize that the residents of King Cove may occasionally have difficulty obtaining emergency healthcare, millions of Americans nationwide suffer from not having access to any healthcare whatsoever. During the ongoing debate over the State Child Health Insurance Program or SCHIP, the Congressional Budget Office estimated that the cost of providing basic health care to one child for one year is \$1,335. With the additional dollars needed just to construct the additional 9-miles of road, Congress could fund health care for nearly 12,000 children next year.

Conclusion

Congress should reject H.R. 2801, the Izembek and Alaska Peninsula Refuge and Wilderness Enhancement and King Cove Safe Access Act. Congress already solved this problem in 1998 with an appropriation of \$37.5 million to upgrade the King Cove Airport and medical clinic, purchase a state of the art hovercraft, and build a road to the hovercraft dock. In 2003, the Final Environmental Impact Statement completed by the Army Corps of Engineers evaluated several alternatives for transportation between the communities of King Cove and Cold Bay. The *King Cove Access Project EIS* considered for comparison the “Isthmus road alternative” and concluded that a 9-mile road would inflict the most harm on this environment.

President Theodore Roosevelt created the National Wildlife Refuge System in 1903 to provide safe havens for wildlife. The Izembek National Wildlife Refuge has been repeatedly recognized internationally for its globally significant wetlands and values and importance for migratory birds. It was the first wetlands area in North America to be recognized under the Ramsar Convention as a Wetland of International Importance in 1986. The Wilderness Act of 1964 called upon Americans to set aside places “*where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain.*” When Congress has already conferred such protections on federal lands, it is incumbent on decision-makers to utilize creative alternatives that satisfy other stated needs. We believe that the current solution has met the needs of the citizens of King Cove. The success of the hovercraft has proven that it is the simplest, fastest, safest, and most cost-effective way to provide reliable emergency access to medical facilities while protecting one of America’s and the world’s great natural treasures.