

Bristol Bay Subsistence Regional Advisory Council

c/o Office of Subsistence Management

1011 East Tudor Road, MS 121

Anchorage, Alaska 99503-6199

Phone: (907) 787-3888, Fax: (907) 786-3898

Toll Free: 1-800-478-1456

In Reply Refer To:
OSM 24024

FEB 27 2024

Sara Boario
Regional Director, Alaska Region
U. S. Fish and Wildlife Service
1011 E. Tudor Rd
Anchorage, Alaska 99503-6199

Dear Regional Director Boario,

Please accept the following comments from the Bristol Bay Subsistence Regional Advisory Council (Council) on the potential land exchange involving Izembek National Wildlife Refuge lands to finish construction of the road between King Cove and Cold Bay. The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Bristol Bay Region in Southwest Alaska. The Council was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region.

The Council met on October 24-25, 2023, in Dillingham, to discuss issues related to subsistence fisheries and wildlife management concerns. At this meeting, the U.S. Fish and Wildlife Service (USFWS) requested comments from the Council on any potential implications the King Cove road may have on subsistence uses and resources. After reviewing the materials presented by USFWS and considering public testimony heard during the Council meeting, the Council expressed support for the land exchange and completion of the road.

The Council was in strong support of the completion of the road that will connect the communities of King Cove and Cold Bay. The King Cove Road is necessary for the safe access to the Cold Bay airport, especially in times of emergencies. Fog and hazardous winds are common in King Cove, and it is often too dangerous to travel by air into this community. Nearby Cold Bay, has the largest airport on the Alaska Peninsula with an air traffic control service that allows for reliable access for medivac flights in times of medical and other emergencies. Access to Cold Bay's airport would substantially increase King Cove's access to reliable air travel in cases of medical or other emergencies. The Council heard and shared

distressing tales of loved ones who died or were in peril because they couldn't get air transportation, plane crashes that have occurred as a result of dangerous weather, and the need for better access to timely medevac flights in King Cove. The Council also heard that medivac by boat is not a reliable alternative because sea conditions are often unsafe. The Council believes the lives and the health of the residents of King Cove should be the highest priority.

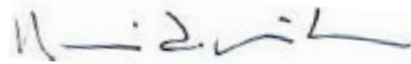
Furthermore, after listening to public testimony and discussion amongst the Council, we determined that the road would not have negative impacts on birds and other wildlife harvested for subsistence uses. The King Cove road instead would enhance subsistence access for those that have had a long tradition of harvesting subsistence resources in this area and have stewarded the land for generations. The road completion and access to the Cold Bay runway will also help foster relations between the tribes that at one point in time had more connected sharing networks.

The Council recommends initiating public consultations with communities that may be affected by the project. These communities include King Cove, Cold Bay, Sand Point, Nelson Lagoon, False Pass, Akutan, and surrounding communities who have family members from King Cove.

The Council would also like to see the following corrections be made to the 2013 Environmental Impact Statement. These include updating the fish, migratory birds, land mammals, and marine invertebrate species list with accurate information for the specific project area.

We appreciate your attention to these recommendations and the Council's perspective. If you have questions or would like additional information, please reach out to me directly or through our Council Coordinator Leigh Honig at leigh_honig@fws.gov.

Sincerely,



Nanci Morris Lyon, Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Shane Walker, Branch Chief for Planning and Policy, USFWS
Maria Fosado, Refuge Manager, Izembek NWR
Office of Subsistence Management
Bristol Bay Subsistence Regional Advisory Council