

Narratives of the North: Contested geographic imaginaries and the case of Izembek National Wildlife Refuge

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This chapter explores the concept of 'wilderness' in Alaska, as a Northern locale. Using the controversy over permitting an access road through legally protected wilderness in Alaska's Izembek National Wildlife Refuge (NWR) as a case study, the research seeks to untangle the ways in which mainstream environmentalist discourse, and the epistemological concepts through which it operates, is implicated in the erasure of Indigenous presence and the ongoing dispossession of Indigenous lands and rights. Grounded in theories from Settler Colonial studies and Indigenous studies, the research deductively applies a Critical Discourse Analysis to public comments made on the Izembek NWR Land Exchange/ Access Road Draft Environmental Impact Statement (DEIS) to offer a discussion on the ways in which the North's geographic imaginaries are constructed and contested within the wider frameworks of environmental conservation, economic development, and decolonization.

“Imagination is one of the spoils of colonization, which in many ways is claiming who gets to imagine the future for a given geography.”

-adrienne marie brown, *Emergent Strategy*

Introduction

Perceptions of land, or *geographic imaginaries*, are both socially constructed and construct the social (Howie & Lewis, 2014: 4). Indeed, while the historical underpinnings of Northern geographic imaginaries are often taken for granted in dominant discourse, “historical perceptibility is used...to claim, to define capacities for self-rule, to apportion social and political possibilities, to, in effect, empower and disempower Indigenous peoples in the present” (Simpson, 2007: 69). If our geographic imaginaries are, therefore, concepts with “teeth that bite through time” (ibid), it follows that discourse about land both reflects and reifies power dynamics to shape material realities. In this way, policies of dispossession are made possible through colonial representations and

constructions of space, such as those which contain and anachronize Indigenous peoples' presence on their lands. Thus in acknowledging that, "space is produced and productive...we unbury the generative roots of spatial colonization and lay bare its concealed systems" (Goeman, 2009: 171).

It is important to recognize that in the North and elsewhere there are many Indigenous Peoples and organizations whose pursuit of self-determination, justice, and safety for their communities in the face of ongoing colonization includes advocating for meaningful environmental protections, as well as strategic partnerships with environmental non-governmental organization (ENGO) allies. That said, though existing literature often highlights the pertinent connection between development projects and enduring spatial colonization, there is less research into the ways ENGOs, and the epistemological concepts through which they operate, also perpetuate harmful colonial legacies, both historically and today. Within progressive circles, ENGO-led battles for environmental protection are often taken for granted as exclusively benevolent, liberal projects wherein "good" environmentalists clash with "bad" states and resource extraction companies. And yet, some ENGO campaigns "that might be assumed to benefit Indigenous peoples can in fact disempower them" (Fondahl, Filippova & Mack, 2015: 14), particularly insofar as they constrain Indigenous Peoples' self-determination over their traditional lands and territories.

Fondahl, Filippova and Mack (2015) briefly highlight the controversy over whether or not to permit a road through Izembek National Wildlife Refuge (NWR) in Alaska as exemplary of how, "the fact that Indigenous northerners have used, thrived in and actively managed these environments for 1000s of years is problematic to the common, romanticized view of northern nature as 'pristine' and 'untouched'" (14). However, the ways in which this dissonance specifically plays out through discourse is a salient gap in the literature. Observing this gap, my research offers a deductive Critical Discourse Analysis (CDA) of public comments on the Land Exchange/Road Corridor Draft Environmental Impact Statement (DEIS). It asks, what are the key contestations between actors advocating for and against the land exchange/access road? The objective of asking this question is to identify, chart, and contextualize the contestations present in this case. In doing so, I attempt to *unbury* some of the ways in which discourse around land management is constructed to reproduce, negotiate, and subvert wider structures of settler colonialism.

Theoretical approach

Settler colonialism

Contrary to hegemonic discourse positioning the U.S. as a postcolonial state, colonialism in the United States did not end when Britain left the continent, and to suggest it did is to deny the existence, resistance, and persistence of American Indian and Alaska Native peoples (Kēhaulani Kauanui, 2016: 3). Under *settler colonialism*, "invasion is a structure not an event" (Wolfe, 2006: 7) because after colonizers arrived, they never left. Settler colonialism operates through both external and internal colonialism¹ because the spatial boundary between the metropole and the colony in *settler colonial* states is nonexistent and, therefore, requires a "total appropriation of Indigenous life and land, rather than the selective expropriation of profit-producing fragments" (Tuck & Yang, 2012: 5).

As an ongoing project, the processes of settler colonialism attempt to dispossess Indigenous lands through the erasure of their original inhabitants, materially and discursively, and then 'indigenize'

settlers in ‘replacement.’ Indeed, territoriality, is the primary motivation for the elimination of Indigenous peoples and “settler colonialism’s specific, irreducible element” (Wolfe, 2006: 388). Every part of the settler state’s social and political institutions, from how maps are drawn to how science is qualified underlies the settler states’ justification for the dispossession of Indigenous lands and discursive erasure of Indigenous sovereignty (Simpson, 2007: 70).

Wilderness imaginaries and the colonial project

Considered a milestone for progressive environmental preservation, the 1964 Wilderness Act created a formal mechanism for wilderness designations and legally defined “wilderness” as “an area where the earth and its community of life are **untrammelled by man**, where man himself is **a visitor who does not remain**” [emphasis added].

As the above language indicates, the Act itself is premised on an intractable boundary between the natural and human worlds, inherited from colonial European imaginaries of wilderness as a state of nature, untouched and ‘untrammelled’ by human culture (yet always in grave danger of ‘contamination’ by ‘modernity’). Thus, the removal of Indigenous peoples and dispossession from their lands was constructed for much of the history of settler environmentalism as a sad but necessary trade-off for environmental protection (Zaitchik, 2018). Settler notions of wilderness and the environmental policies born out of them often disavow pre-existing Indigenous polities on those lands while enclosing both wilderness and Indigenous peoples within mythically anachronistic wilderness areas, such as National Wildlife Refuges (NWRs).

At the turn of the twentieth century, quests for ever-more wilderness opportunities by the Romantic back-to-nature movement provided the intellectual justifications for Westward expansion over even more Indigenous territories in the Far North (Kollin, 2001: 96). Because wilderness designations are rooted in the notion of ‘peopleless landscapes’ there lies a tension within environmentalism “between the rights of native peoples to be masters of their own cultural evolution on the one hand, and the desires of preservationists to retain the ‘primitive’ feeling of Alaska’s pristine wilderness on the other” (Higgins, 2017: 291). Meanwhile, social constructions of “Wilderness” are safeguarded through North America’s environmental institutions wherein ENGOs and the superintendents of the national parks system serve, in many ways, as “curators and policemen, protectors of valuable commodities” (Byerly, 1996: 57).

Admittedly, the 1970’s Wilderness movement in Alaska, which culminated in the Alaska National Interest Lands Conservation Act (ANILCA)², made unprecedented concessions to the notion of an “inhabited wilderness” by retaining rural resident’s rights to subsistence hunting and fishing within national parks (Kantor, 2007: 61). However, this shift did not afford Alaska Natives collective rights to subsistence use of public lands. Rather, it subsumed their rights under rural use, equating settler homesteaders with Indigenous peoples before the law (ibid) and dispossessing urban Indigenous peoples of these same subsistence rights. Furthermore, as this chapter will show, persisting colonial imaginaries of a peopleless landscape found in some environmentalist rhetoric continues to problematically disavow Alaska’s Indigenous communities, and work against their self-determination, sovereignty, and safety.

Case Study – Izembek National Wildlife Refuge

Izembek NWR straddles the Bering Sea and the Gulf of Alaska on the Alaska Peninsula. The smallest of Alaska’s NWRs, it includes a narrow isthmus of land between the Izembek and Kinzarof lagoons. This isthmus is the only land connection between the fishing community of King Cove (population 938; 2010 U.S. Census) and Cold Bay (population 108; 2010 U.S. Census), which houses the region’s only commercial airport.³ The community of King Cove is predominantly Unangax̂/Aleut⁴ and members of the Agdaagux Tribe of King Cove. Unangax̂ have been living on the Alaska Peninsula for at least 5,000-10,000 years (Aleutians Pribilof Islands Association) and, for all intents and purposes, are the Indigenous First Peoples of the region since time immemorial.

Though it is possible to travel to and from King Cove by boat or small plane, extreme weather conditions routinely make the journey difficult, if not impossible. Residents often wait days for travel conditions to improve. The residents of King Cove believe that a land route to Cold Bay would improve their access to a safe, reliable, and affordable form of transportation for both medical emergencies and quality of life.

As part of a wider national conservation movement, the area around Izembek Lagoon was first established as the Izembek Range in 1960. Then, in 1980, Izembek was re-designated as an NWR under the ANILCA and 300,000 of the refuge’s 315,000 acres were federally designated as ‘Wilderness.’ Transportation corridors are not legally permitted in designated Wilderness. However, under ANILCA, it is possible to allow a reversal of Wilderness designations on Federal lands through the exchange of land of equal or greater value with an Alaska Native tribal corporation.⁵

In 2009, the U.S. Congress passed the Omnibus Public Lands Management Act (OPLMA), approving the exchange of a little over 200 acres of federally-held land within Izembek NWR for more than 56,000 acres of land owned by the State of Alaska (SOA) and King Cove Corporation (KCC), for the purpose of building a single lane gravel road connecting the communities of King Cove and Cold Bay. Pending approval by then Department of the Interior (DOI) Secretary, Sally Jewell, the road would bisect the narrow isthmus running between the two lagoons and traverse seven miles of designated Wilderness (see Fig. 1.1). As per law and to inform the Secretary’s

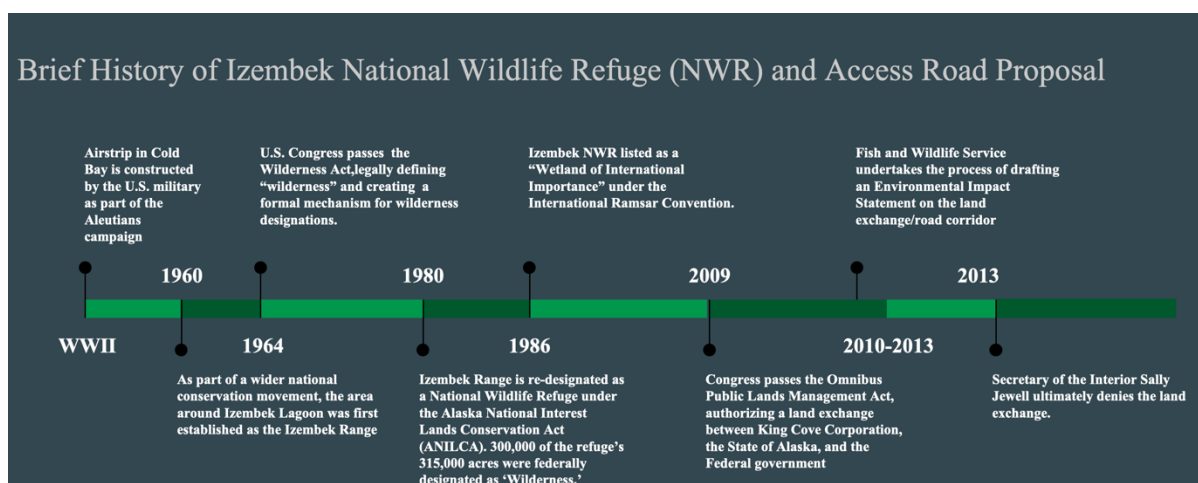


Figure 1 Brief timeline of events related to the Izembek NWR Land Exchange/Access Road Proposal analyzed here.

decision, the U.S. Fish and Wildlife Service (FWS) prepared an Environmental Impact Statement (EIS) to evaluate the potential impacts of the land exchange and subsequent road.

The debate around the land swap, as mediated through the EIS process, marks one flashpoint in the now decades-long debate between the mostly Indigenous Unangan residents of King Cove, who want to build a road through Izembek to gain access to the airport at Cold Bay, and ENGOs who are fighting to protect the unique flora and fauna present in the refuge.⁶ Input was received from a range of national conservation groups and their Alaska chapters including The Wilderness Society (TWS), Defenders of Wildlife (DOW), the Sierra Club, Audubon Alaska, and the National Wildlife Refuge Association (NWRA). Of the 71,960 public comments received by FWS on the Draft EIS (DEIS), 70,110 were form letters from supporters of these organizations, highlighting their level of visibility and national support.

In their comments on the DEIS, ENGOs exclusively advocate for a denial of the land exchange and maintenance of current land management plans. ENGOs express concern about the impacts of a road on “wilderness values” and the degradation of habitats used by wildlife in the area. Of particular concern to ENGOs is Pacific Black Brant and Steller’s Eider, nearly the entire global populations of which use Izembek’s narrow isthmus as a seasonal habitat. They also express concern over cost to taxpayers and the danger of setting a precedent for de-designating other protected wilderness areas via land exchange, such as the Arctic National Wildlife Refuge (ANWR).

Methodology

Guided by my theoretical framework, I deductively applied Critical Discourse Analysis (CDA) to select public comments to delve into the relationship between the discourse and material realities. CDA is “an interdisciplinary approach to textual study that aims to explicate abuses of power promoted by those texts, by analyzing linguistic/semiotic details in light of the larger social and political contexts in which those texts circulate” (Huckin, Andrus & Clary-Lemon 2012: 107). It follows that my methods are interdisciplinary, wholly qualitative, and use a close reading of textual evidence to develop a logical chain of argumentation, similar to a literary analysis.

Correspondingly, under feminist standpoint theory, knowledge that emerges out of the politicization of one’s own personal experience with injustice bridges theory and practice. In this sense, proximity and personal investment are not hindrances to good research, but rather allow for a more complete analysis. With this in mind, my research gives more weight to analysis offered via testimony and public comment by those most proximal to the debate, the Unangan people of King Cove. Meanwhile it should be noted that their criticisms against ENGOs often corroborate the theoretical frameworks offered in existing literature critical of environmentalism (see Willems-Braun, 1997; Voyles, 2015; Zaitchik, 2018; Higgins, 2017; Kantor, 2007; Kollin, 2001). In other words, this research in many ways re-iterates issues that Indigenous Northerners have been problematizing and theorizing on in their everyday contestations over land since the moment of colonization.

Secondly, rejecting the positivist idea that knowledge can be ‘objective’, this research gives me the opportunity to reflexively examine an issue I am intimately entwined with at many points. I was born and raised on Dena’ina Elnena (Dena’ina Lands) in Anchorage, Alaska’s largest city. As a non-Indigenous resident, my position in the geographic and political space of my homeland is as

a settler. Hence, it is impossible for me to extricate myself wholly, if at all, from the problematics of my own very materially implicated positionality within the contestations over Alaska's social, political, and geographic landscape. It is equally impossible for me to remove myself from the implications of my work as a scholar within the system of academia, wherein colonial power is still located and reproduced. It follows that my research is not neutral. Rather, it is purposefully designed to problematize the constructions of settler space, discourse, and identities within institutions I am either directly a part of or indirectly benefit from.

Some approaches to reflexivity and positionality can paralyze research by placing too much emphasis on identity as the locus of legitimacy and by reinforcing the importance of oppressive categorizations even as it seeks to dismantle them (Nagar, 2014: 84). As Smith (2012) writes in *Decolonizing Methodologies*, "Writing can be dangerous because we reinforce and maintain a style of discourse which is never innocent" (37). Even as I problematize enduring coloniality and settler narratives within the debate over Izembek, I risk re-inscribing them or otherwise reifying the myth that the process of colonization is a 'done deal'. My research inevitably reinforces an Indigenous-settler binary that risks "treating settler colonialism as a meta-structure, thus erasing both its contingency and the dynamics that co-constitute racist, patriarchal, homonationalist, ableist, and capitalist settler colonialism" (Snelgrove, Dhamoon & Corntassel, 2014: 9).

Identifying and disrupting the discursive concepts which continue to bite through our temporal and spatial imaginaries is a necessary first step in transforming present and future material conditions. But, Kauanui (2016) suggests shifting focus away from enduring colonialism, and towards 'enduring Indigeneity', thereby re-centering the experiences and narratives of Indigenous peoples, as opposed to settler anxieties and whiteness. In this way, she and other Indigenous theorists refute the underlying notion that colonization is a finished project. And, though I do seek primarily to highlight instances where coloniality is reproduced within discourses that have been unattended to, I simultaneously hope to center the premise that firstly, Indigenous peoples "exist, resist, and persist; and second, that settler colonialism is a structure that endures Indigeneity, as it holds out against it" (Kauanui, 2016).

Data collection

As part of the EIS process, a large volume of public comments (71,960) were submitted during the 2012 public comment period. The FWS itself reviewed, sorted, and synthesized public comments and testimony according to a rigorous methodology and collated them as Appendix G of the FEIS, *Comment Analysis and Response Report*. The FWS coded and categorized substantive comments into 32 issue categories and grouped them into 369 unique *Statements of Concern*. As evidence of these comment submissions, Appendix G includes letters it received from key actors, such as tribal organizations, politicians, King Cove residents, and ENGOs. Appendix G also includes transcripts from all five public hearings held across the state, which offer a more candid, informal discourse to complement formal letters. As such, Appendix G offers a convenient and thorough content analysis upon which to build my own qualitative study.

It would be near impossible to conduct a close reading of all 71,960 submitted comments. But, in building off of FWS' well executed quantitative content analysis of the DEIS comment submissions, I was able to conduct a qualitative CDA of these texts that enjoys both the depth of my own close reading and the breadth of the content analysis previously conducted by the FWS.

While the *statements of concern* identified in the EIS provided me with a methodologically-sound thematic foundation through which to guide my close reading of the texts, the texts themselves (letters and transcripts together) offer a comprehensive representation of stakeholders' discourse.

Method of analysis - Close reading

In my own analysis of sample letters and hearing transcripts, I conducted a close reading of texts (see Appendix A) from 22 ENGOs, 11 Alaska Native organizations, the City of King Cove, two U.S. Congressmembers, and 93 individuals representing organizations and/or themselves.

Unlike a quantitative analysis, the excavation of texts through close reading, while susceptible to variable subjectivity, can situate what is not explicitly stated in a text within a wider context. Close reading, as a means of textual analysis, is well-suited to CDA as a methodology. Kuttainen (2009), for example, uses close readings of texts from 'settler' literatures in Australia to uncover the underlying anxieties, historical revisions, and erasures present in the settler-colonial state.

In my own study, I identified themes in the narratives that actors employed to argue for their positions. For example, I collated comments spanning the five public hearings in Anchorage, King Cove, Cold Bay, Sand Point, and Nelson Lagoon/False Pass and identified my own discursive themes based on observed dissonances that emerged between different actors' narratives, such as historical scope and the language used to describe the land. After the initial reading, I then charted specific dissonances and contestations within the observed themes.

My textual analysis allowed me to holistically map how the narratives interacted; for example, with regards to shifts in the stated reasons for road construction and the strategies employed to authenticate each group's narrative and discredit others. The third phase of my CDA was loosely based around Dunn's (2008) historical representations method (Ch. 6) and historicized and contextualized the discourse in wider theoretical frameworks of settler colonialism, enduring Indigenous resistance, and self-determination.

The large amount of text I sought to analyze, and the myriad of actors involved, were a challenge. Though I eventually limited my scope to primarily focus on ENGOs and Unangan actors to better categorize my research in a legible way, I greatly risk flattening or otherwise essentializing the actors' positions. Further, in relying on the comments submitted to the FWS, my findings are wholly reliant on the objectivity of the FWS' comment analysis in selecting which comments to include in full. My findings are also limited in that they only take into account actors who have knowledge of and access to the EIS process.

Results and discussion

Sites of contestation often belie larger structural dissonances. In the following sections I will discuss some key findings from the conducted study that indicate the role of ENGOs in perpetuating structures of settler colonialism and the ways in which the boundaries of the debate itself encroach on possibilities for self-determination and sovereignty.

Producing wilderness

A close reading of the texts shows that in its value as an aesthetic and symbolic commodity, Izembek is constructed to maintain an illusion of wilderness, by and for the consumption of the

settler state. ENGOs consistently bind Izembek NWR in language of purity, wholeness, and fragility. Words like “pristine”, “untrammled”, “untouched”, “fragile”, “unspoiled”, “sensitive”, “vulnerable”, and “unfragmented” are some of the most common qualifiers used to discuss both the wetlands and the wildlife. This discourse connotes an ENGO imaginary of a peopleless landscape, with Unangan presence invisibilized. As a markedly “man-made feature”, the FEIS similarly finds that “Constructing a road would have a major effect on the untrammled, natural, and undeveloped qualities of the Izembek Wilderness and the Kinzarof Lagoon parcel and would also affect solitude or primitive and unconfined recreation” (USFWS, 4-255). In other words, roads are incompatible with “wilderness” values because they disrupt the Romantic imaginary of a peopleless landscape, far removed from the contaminating effects of ‘modernity’.

The reliance on these ideals in contemporary debates like Izembek evidence that they are concepts “with teeth that bite through time.” And yet, ‘wilderness’ is not ‘wild and free’ so much as a cultural production designed by humans and clearly beholden to specific and restrictive protocols governing what is acceptable and what is not within its boundaries (Kollin, 2001: 37). The creation of national parks in Alaska, in general, was greatly influenced by the imaginations of a wider U.S. public (many of whom would never set foot in Alaska) wherein Alaska symbolized the “last best chance for wilderness” (Higgins, 2017: 292). Fittingly, the ENGO coalition letter describes Izembek NWR as “one of the few remaining wild places in our country not lost to development” (D.13). Current anxieties over the very real threats of the climate crisis, and the urgent action it demands, may exacerbate the buoyancy of this elegiac narrative; fueling a preservationist rhetoric perpetually rooted in revisionist ‘nostalgia’ for a ‘pre-historic’ time before ‘man destroyed Nature’.⁷

Inciting a sense of urgency to *save* “one of the few remaining wild places” through elegiac narratives is a logical campaign mobilization tactic. And, in trying to convey this urgency to faraway supporters, ENGO campaigns may understandably collapse the complexities of the debate over Izembek into a simple binary of “nature spoiled, or nature saved” (Willems-Braun, 1997: 24). However, ENGOs themselves also seem to financially benefit from upholding geographic imaginaries of a peopleless landscape. For example, TWS and other environmental groups criticize the DEIS’ cost analysis for not adequately considering the loss of an estimated \$1 million USD in passive use values should Izembek’s “pristine” wilderness be converted into a roadway. TWS identifies passive use values as the willingness of people who may never actually visit an NWR to pay for the protection of its land and wildlife (D.4:8). It states, “With respect to wildlife, people are clearly willing to pay to protect species – some of them halfway around the world – that they may never even view. Contributions to international wildlife organizations are an example of how that willingness to pay is manifested” (D.4:8).

In referencing the loss of passive use revenue in the form of contributions to ENGOs, TWS may also implicate how ENGOs themselves benefit from launching high profile campaigns to protect “Wilderness”. Given ENGOs opposition to the loss of passive-use values, I argue that the propagation of a narrative of a Wilderness, pure and pristine, but in grave and urgent danger of human contamination, financially sustains ENGOs, individually and as an institution. Similar critiques have been levied against other ENGOs. In the past, Greenpeace relied on a tactic of generating widespread outcry over Canadian sealing to bring in revenue for other campaigns, despite the fact that seal populations were not endangered and the campaign itself was deeply harmful to Inuit communities (Angry Inuk, 2016). Alongside the Greenpeace case, Izembek, in

particular, may offer an example wherein ENGOs maintain a hardline discourse of environmental crisis even where the actual environmental impact is less severe than the impact to human safety, as will be discussed later.

In many ways, wild animals are central to the national imaginary of Alaska as a Last Frontier and an anachronistic space (Kollin, 2001: 156) and there still exists a tendency in contemporary ENGO campaigns to minimize the presence of Indigenous peoples, instead centering landscapes and animals. For example, ‘Save the Arctic’ campaigns typically feature a polar bear to evoke sympathy from the metropole in a purely aesthetically consumptive way - without attention to their relationality to humans (Boyer, 2017: 103). That said, thanks in large part to the persistent resistance to erasure by Indigenous peoples themselves, some prominent ENGOs are now making a concerted effort to re-center Indigenous communities and environmental justice in their advocacy overall. However, in the case of Izembek, the data analyzed here show it is concern over birds, not King Cove residents, which catalyzed the nation to pay attention and contribute to campaigns against a road through Izembek NWR.

Relationality

Whereas ENGOs frame markers of ‘modernity’, such as roads, as an unnatural occurrence which negatively infringe on the ‘pure’ qualities of ‘wilderness’, King Cove residents’ assertions of their relationship with the land reads as a refusal to be enclosed into this imposed binary. Ontologically, Unangan discourse consistently places humans in relationship with the environment, affording other animals and entities agency and allowing for a human role in a balanced ecosystem. The Belkofski Tribal Council President remarks, “We have ties to all of the wildlife that lives in the Izembek Refuge. This wildlife is part of who we are” (C.5). Another testifier at the Sand Point hearing states, “Yes, refuges are beautiful. To look at a swan is wonderful...But we don’t look at them like that. We look at them as food. And we know how to take care of them” (E.2).

In direct opposition to environmentalist discourse positioning human culture as incompatible with wilderness values, land, animals, and humans are framed in the discourse as co-dependent, dynamic, evolving, and adaptive; rather than “vulnerable” and in need of saving, being spoken for, or preserved in an anachronistic fiction. An example of this is found in the claim, mirrored by many King Cove residents, that birds and other wildlife “are very adaptable and resourceful”, and not “as fragile as some uneducated people believe” (C.7).

“We the native people of this region are more familiar with the migrating patterns and behaviors of the animals here than anyone else. We are also more vested in insuring these resources thrive as our people have been relying on them for thousands of years for our own survival”

Box 1 Excerpt from FEIS Appendix G, Comments submitted by Tribes and Alaska Native Corporations

Indeed, refuting the inherent authority of knowledge derived from outsider scientific studies, much of the discourse asserts the authority of local and Indigenous Knowledge (IK) and reiterates local investment in continuing to practice sustainable land management. Asserting the generations of knowledge behind Indigenous land management and stewardship tactically casts doubt on the purportedly “devastating” impact of the road and declares the compatibility of both land use and land protection under Indigenous polities, refuting attempts by settlers on both sides of the debate to create a false dichotomy between the two.

In contrast, the road itself is described by ENGOs and their supporters in visceral and violent language. They make repeated references to the ways in which the road would “cut”, “slice”, “punch”, and “devastate” the NWR, which is subsequently personified as the “ecological heart” of the area. And, while cautious of slipping into essentializing Indigeneity under “ecologically noble savage” tropes (Angl s-Grande, 1999), it bears noting that the “ontological turn” occurring in the field of ecology toward a more interconnected understanding of ecosystems is one which has been largely appropriated from Indigenous cosmologies and knowledge systems in the first place (Todd, 2016). This often occurs, as in these texts, without attention to ongoing Indigenous struggles over land rights, much less citational credit given to actual Indigenous peoples as originators of these ontologies (ibid). Indeed, Kollin (2001) finds that the appropriation and co-optation of Indigenous terminologies and subject-position was the mechanism through which Robert Marshall, founder of TWS, could “imagine himself as one of the region’s first real explorers” (73).

Self-determination and the ideal victim – Debating the purpose of a road

Similarly, the dissonance between the road as a lifesaving, unobtrusive necessity and the road as a violent, invasive frivolity is a key contestation in the debate. However, it problematically de-centers the discussion, moving the focus away from sovereignty and self-determination and into a debate over the believability of King Cove’s performance of ideal victimhood. In advocating for the road, King Cove residents consistently characterize their “critical” need for transportation that is “safe”, “reliable”, and “affordable”. The majority of comments testify to personal experiences with unreliable transportation options during medical emergencies. Others reference how a road would improve quality of life by allowing easier mobility to and from King Cove, in turn permitting elders to stay in the community, greater connectivity to friends and family in the rest of Alaska, and even the opportunity to visit people in Cold Bay on a more regular basis.

The prohibition of commercial use of the road was an explicit condition of the Congressional act that authorized the land exchange. Despite this, potential for commercial use is consistently brought up by environmental groups and is a vehicle through which ENGOs frame King Cove as untrustworthy. While King Cove’s argument for why a road should be constructed oscillates between medical necessity and “quality of life”, ENGO proponents repeatedly characterize the land exchange as “a solution in search of a problem” alongside assertions that the true purpose of the road is for recreational and commercial purposes, not health and safety as claimed by King Cove residents. ENGOs strategically frame King Cove’s continued insistence on the necessity of the road as an unreliable, and even fraudulent narrative. Attempts are made to discredit and delegitimize the necessity of the road for health and safety and King Cove residents are called “shameless” and accused of “flouting the law”, while motives behind the land exchange are dismissed as “some perceived need” and “overt but suspect.”

The claim that King Cove’s need for the road is false may fit into expectations that King Cove perform their victimhood in order to be ‘deserving’ of the road. For example, commenters against the land exchange speculate on whether health and safety is a genuine reason for the road, or if it is perhaps for personal travel, access to the NWR, or commercial use, and therefore unwarranted. In one letter, ENGOs conclude that “the true purpose of the road appears to be the transportation of fish industry employees and commercial fish products rather than health and safety” (D.13:32).

In many ways, then, the strategy found in the majority of ENGO arguments is to interrogate King Cove's performance as a "perfect victim." The boundaries of the debate are limited to whether or not King Cove residents are credibly in need of *rescue*, maintaining settler's sovereignty over who to "save" or "not to save." The *authenticity* of King Cove's medical necessity is further situated in competition with the vulnerability of an Otherized natural world that is constructed as in grave danger.

Policing of Indigeneity

The settler state's preoccupation with defining Indigeneity can be a trap wherein Indigenous people are 'managed' by reductive definitions imposed and policed by a colonial system (Snelgrove et al, 2014:13). In Alaska, for example, legal definitions of Indigeneity based on colonial blood quantum rules still dictate access to lands, resources, and rights (Fondahl, Filippova and Mack, 2015:10). As Tuck and Yang (2012) note, "Indigenous identity and tribal membership are questions that Indigenous communities alone have the right to struggle over and define, not DNA tests, heritage websites, and certainly not the settler state" (13). A list to which I would add settler environmentalists.

Yet, within the frame of 'wilderness', with its strictly policed dichotomies of nature/culture, traditional/modern, the only actors "authorized to 'speak for' nature" are 'disinterested' ecologists and 'traditional' Indigenous peoples, whose identity is imposed on them and who are often 'spoken for' (Willems-Braun, 1997: 23). Similarly, the commentary from a conservationist supporter and Anchorage resident in Box 2 regurgitates the idea that *authentic* Indigeneity must fit neatly into the settler imaginary of being recognizable to settlers as "ecologically noble" and exemplifies Johnson's (2011) claim that settlers problematically define Indigenous Peoples by a lack of culture and an inherent vulnerability to white settlement (196).

"Out came the old canards of guilt that the white man took Native lands and hauled the Aleuts off to camps in Southeast Alaska as if they had anything to do with building a road. Another regurgitated theme is that the Aleuts have thousands of years of history of living in the area and have respect for the land. Notwithstanding that Alaska's indigenous peoples have lost most of their cultural roots, the notion that they are magically conservationists echoes Ralph Waldo Emerson's observation that 'the louder he talked of his honor, the faster we counted our spoons'. This was a myth started by naïve environmentalists in the 1960's who were casting around for historical icons that has become gospel within the Native community not based on fact. The overwhelming evidence is to the contrary. Some of the 'Aleuts' testifying clearly had no factual sense of their own history."

Box 2 Excerpt from FEIS Appendix G, Examples of comments submitted by citizens and non-governmental organizations

This passage, though clearly more blatantly racist than letters sent as official ENGO statements, highlights the white fragility and the policing of Indigeneity present in the debate. Box 2 moreover, exhibits what Goldstein (2008), describes as the tendency in anti-sovereignty discourse to use acknowledgement of a past genocide and dispossession, "as evidence of the necessarily diminished capacity of tribal nations to make present-day claims" to self-determination (836). The vulnerability of Indigenous Peoples to a contaminating encroachment,

as narrated by some environmentalists, starkly resembles the ways in which the nation's last frontiers of wilderness are constructed as inherently vulnerable, to the "expanding settlement" of the settler colonial nation. In this paradigm, nature is constructed as "the absence of culture"

wherein Indigenous presence must “not exceed the bounds of the traditional” (Willems-Braun, 2001: 22).

This particular letter relies on an inversion the “ecologically noble savage” trope to deny the validity of Indigenous sovereignty over Indigenous lands. Similarly, environmentalist rhetoric often polices Indigeneity by ascribing the “ecologically noble savage” trope to some Indigenous groups while refuting it for others who do not neatly fit their narrative (Angl s-Grande, 1999: 307). This tendency overlooks the fact that while Indigenous peoples demand free, prior and informed consent (FPIC) over projects in their territories, they are not necessarily anti-development (Fondahl, Filippova & Mack, 2015). Further, discrediting the Indigeneity of Unanga  advocating for the construction of a road, with the claim they have “lost most of their cultural roots”, is a stark example of how settler logic *vanishes* Indigenous Peoples as a tactic of dispossession. Often the lost purity for which settlers pine includes not only the construct of a wilderness, but also encloses Indigenous Peoples into this ‘always-disappearing’ geography. In its puritanical insistence on a natural world ‘untainted’ by ‘unnatural’ human culture, conservationism perpetuates the trope of Indigenous Peoples as always vanishing, conveniently making room for settlers.

Historic scope and the right to Free, Prior, and Informed Consent (FPIC)

For ENGOs, a land exchange would “erode the original and historic boundary of the refuge” (D.13), placing their focus on “precedent” squarely within a shallow temporal scope. The historical context offered in environmentalist discourse is limited to jurisprudence and legislation such as Izembek’s 1960 designation as a Wildlife Range. ENGO actors often refer back to the initial moment of designation as the presumed starting point of humanity’s recognition of Izembek as a special place. One conservation supporter frames the designation as “exemplary of how long its unique natural values have been widely recognized” (D.11). ENGOs further argue that the land exchange should be denied because “Izembek Refuge is an essential part of America’s wild legacy protected generations ago by individuals with the foresight to know that this area has national and international conservation significance” (D.13:33).

Even on the USFWS website’s Izembek NWR page, the sole mention of Unangan people is found in a lonely sentence under the “History of the Refuge” section: “The earliest people of the area were the Paleo-Aleuts who migrated from interior Alaska” (USFWS, 2013). This situates Indigenous presence squarely in a long-ago past and employs a trope of Indigenous peoples as settlers themselves, an inversion designed to justify colonization. These narratives distinctly erase the sovereignty and stewardship over that land by Unangan peoples, perpetuating the myth of the moment of ‘discovery’ as when the first white man experiences a geography, thereby disavowing existing Indigenous sovereignty (Voyles, 2015: 46).

Unangan discourse, in contrast, situates the debate in their millennia of sovereignty and stewardship over the area and actively contests the enclosure of Izembek's "historic boundary" within a temporal imaginary conditioned on the settler experience. Additionally, many testimonials reference the right to FPIC, the exclusion of Unangan people in designating

"This road will traverse Izembek National Wildlife Refuge, a huge swath of land in our backyard that was designated "wilderness." This decision, made decades ago, severely restricted our use and access to the land. Residents of King Cove were largely excluded from this land-use decision - just one in a long string of failures by our federal government to solicit and value the input of indigenous people on the use of their ancestral lands. Sad to say that the first that many of us knew about this government action was when we found our subsistence cabins burned to the ground in the 1970's"

Box 3 Excerpt from FEIS Appendix G, Examples of comments submitted by citizens and non-governmental organizations

the land as "wilderness" in the first place, and the systematic burning of pre-existing hunting cabins by the federal government after the land was designated as a wildlife range. In testifying to these historical injustices, road proponents *re-frame* the current debate within the history of settler colonialism, the dispossession of Indigenous lands, and the denial of meaningful FPIC.

Nevertheless, the conversation within the DEIS remains largely bounded within the confines of colonial wilderness legislation. Though Indigenous Peoples often utilize competition between state and federal governments to carve out redress and rights in the U.S. legal system, "the tortuous articulation of juridical reason and multiscale distribution of political and legal authority reinforce colonial rule even when appearing to challenge it" (Goldstein, 2008: 842). Thus, even when nimbly manipulated, law is always in the interest of the settler colonial project.

Indeed, the land exchange is positioned by ENGOs and their supporters as "undermining" the purpose of the refuge as delineated in the 1964 Wilderness Act. And perhaps it is. Yet, it seems there exists an inherent incommensurability between sovereignty for Indigenous peoples and the legal framework of Wilderness designations, entangled as it is with European binaries of Nature vs. Man and, more insidiously, with the colonial project itself. The abnegation by conservation groups of Indigenous histories on the land that is now Izembek NWR cannot be taken for granted as naïveté. Rather, "the negation of [I]ndigenous views of history was a critical part of asserting colonial ideology" (Smith, 2012: 30). In this case, admitting to the existence and sovereignty of Unangan polities prior to the moment of settler recognition would jeopardize the concept of "public ownership" over land that was stolen, and threatens the very underpinnings of U.S. fantasies of sovereignty⁸, including its legal authority to regulate wilderness.

Conclusions

By focusing in particular on how ENGOs frame the debate my research highlights the ways actors who may be taken for granted as benevolent in the realm of liberal justice projects can reproduce and feed colonial power structures. ENGO discourse is clearly situated within prevailing colonial imaginaries of wilderness as an anachronistic space, perpetually at risk of total destruction. From this epistemology, ENGOs locate the impact of a road across a broad, international geographic space, but enclose it in a shallow historical context premised on the "first white man experience". Meanwhile, ENGO arguments against the road tactically disavow King Cove residents' Indigeneity, historical context, and credibility within the confines of ideal victimhood. In their

concern over “passive use” values, ENGO discourse also may evidence how maintaining problematic imaginaries of wilderness financially benefits ENGOs themselves.

In continuing to operate from colonial imaginaries, ENGOs may also hamper their own cause and leave little room for imagining alternative futurities outside of a polarizing paradigm of environmental protection vs. economic development, which remains firmly rooted in colonial ontologies about land. The ways in which approval of the road⁹ is readily translated to other projects on Indigenous lands, such as the opening of ANWR to oil drilling or the approval of the Pebble Mine project is certainly concerning. But, the fact that construction of a needed road could catalyze such a domino effect may also be an unfortunate symptom of the untenable legal landscape of environmental protections; founded as they were on Indigenous dispossession and colonial epistemologies of a fictive, peopleless space.

Haycox (2016) writes, “forging a false history inflates and distorts identity; it occludes a realistic and usable vision of the future” (p.16). Indeed, ignoring yesterday’s ‘inconvenient’ histories ensures the perpetual creation of exponentially more inconvenient futures. ENGO disavowals of history read as an attempt to construct Alaska as a ‘postcolonial’ space and as a *move to innocence* (Tuck & Yang, 2012). Further, in simultaneously appropriating Indigenous cosmologies and fighting to retain Federal control of stolen land, ENGOs help to sediment the sovereignty of the settler state. Colonial epistemologies, though perhaps buried under layers of ostensible progressive values and environmental consciousness, will continue to reproduce harm, especially if actors are not willing to address that the teeth of colonialism continue to bite through their contemporary ideologies. In failing to challenge the epistemological boundaries of an “untrammled” wild, nor to bring legislation regulating wilderness in line with Indigenous self-determination, ENGOs are complicit in settler colonialism.

Opposition to the land exchange may indicate how ENGOs can, and often do, perform a version of conditional solidarity with Indigenous peoples when it aligns with their own goals, but not necessarily in the interest of Indigenous sovereignty and self-determination. Of course, ENGOs are not necessarily obligated to advocate for decolonization at all costs. But neither are we obligated to take for granted the inherent progressiveness of environmentalism. The selective picking and choosing of when an Indigenous group’s Indigeneity is used to legitimate environmental causes and when it is simply ignored or discredited because it does not fit conservationist narratives drives farther the wedge between settler environmentalism and Indigenous communities. Disrupting the false binary of *nature spoiled* or *nature saved* also means relinquishing control over decision making. And, more importantly, it means respecting sovereignty, FPIC, and self-determination in solidarity with Indigenous peoples, even in cases where those rights are incompatible with ENGOs’ imaginaries of what environmental protection looks like.

Izembek certainly offers one instance of the ways in which the settler colonial project continues to infringe on Indigenous sovereignty over their traditional lands. However, while ENGOs appear to sediment the concreteness of the land as “wilderness” *in fact*, Unangan actors challenge the fixity of a space that is socially constructed in the imaginations of conservationists and their supporters, subverting the imposition of dispossessive narratives even as they tactically re-appropriate narratives of Indigeneity and victimhood as a strategy for achieving material outcomes. King Cove residents further localize their narratives within the boundaries of Unangan homelands and situate

the debate in a much broader historical context than their ENGO counterparts. Discourse in support of the road repeatedly challenges the legitimacy of the legal-juridical landscape of Wilderness designations as an operational framework. Indeed, the narratives deployed by Unangax̂ in general exemplify sites of enduring Indigeneity, re-assertions of self-determination and sovereignty, and refusals of attempts to enclose their narratives in settler binaries.

Finally, insofar as it involves the repatriation of Unangan lands to Unangan people for their use, enjoyment, health, and connectivity to other lands, the battle over Izembek certainly can be recognized as a movement for self-determination. Just as Alaska Native peoples continue to successfully carve out self-determination from the insufficient confines of ANCSA (Case and Dorough, 2006), so too are Unangan people of King Cove engaging in an act of survivance¹⁰ and refusal of colonial enclosures in the fighting to secure a road. However, as mentioned by some King Cove residents (see E.5, for example), the lands KCC would give up in exchange means the legal fabric on which the proposed land exchange is occurring unavoidably perpetuates the settler colonial project. Through the lens of self-determination, a land exchange should not depend on whether or not the road is viable year-round, proven to be medically necessary, nor even whether it is intended for commercial purposes. To go a step farther, a lens of decolonization would problematize the concept that lands need be exchanged and given to the Federal government at all.

Notes

1. While *external* colonialism refers to the *extraction* of Indigenous resources to serve the metropole, often through military force, *internal* colonialism refers to the domestic, often institutionalized, management of lands, people, and environments *within the borders* of the imperial nation state (Tuck & Yang, 2012:4).
2. ANILCA added over 100 million acres of land in Alaska to new or existing conservation systems. It doubled the size of the National Parks System and was the single greatest expansion of protected lands in U.S. history. It also uniquely allowed for rural subsistence hunting and fishing on protected lands, in some ways redefining the concept of wilderness as unpeopled. (Haycox, 2016, ch.5)
3. After Japan invaded the Aleutian Islands during WWII, the U.S. military occupied much of southwest Alaska⁸ and constructed a strategic air base on what is now Cold Bay. Notably, the airport, along with some roads and buildings within what is now the refuge, were originally built by the U.S. military as part of the Aleutian campaign during WWII.
4. 'Aleut' was the name applied to the Unangax̂ people by Russian colonizers in the mid-1700s, the Unangam tunuu word is Unangan or Unangax̂ (plural). Though often used interchangeably, this dissertation will use Unangan/Unangax̂ to refer to the Indigenous people of King Cove.
5. Corporations were established following the passage of the Alaska Native Claims Settlement Act (ANCSA) in 1973. Under ANCSA, Alaska Native tribes' aboriginal land

claims were “extinguished” in exchange for a comprehensive settlement package which included the distribution of \$962.5 million and 44 million acres of land. King Cove Corporation is the village corporation formed under ANCSA to represent the interests of the Agdaagux Tribe of King Cove. The regional entity is The Aleut Corporation. For a comprehensive explanation of ANCSA’s history and complex statutes please see Paul Ongtooguk’s *The Annotated ANCSA* available at <http://www.alaskool.org/projects/anca/annanca.htm>

6. As intermediaries and decisionmakers, the SOA and the federal government are also key actors.
7. However, the “implicit fatalism” of apocalyptic environmentalist rhetoric elegizing Alaska as the nation’s “last best chance” may actually counterproductively imply the futility of efforts to mitigate the climate crisis, incentivize greater human impacts, preclude alternatives to an assumed ‘inevitable’ destruction and, in the long run, imperil Alaska’s futurities (See Elliott, 2017).
8. The fantasy of sovereignty was rooted in the myth of European 'discovery' of lands that were already inhabited and governed by sovereign Indigenous nations. Indeed, the discursive practice of claiming a land as terra nullius, 'uninhabited', or 'empty wilderness' preempted any actual logistic ability of colonial states to enact control over Indigenous territory; “discovery claims were made credible only after they could be actualized by settlers on the ground, at which point these claims could then be retroactively projected onto the past” (Gaudry, 2016: 49). In other words, it was not law that transformed settler fantasies of sovereignty over Indigenous polities into material realities, but discourse sedimenting it as common sense, which first “erases Indigenous political authority in theory without accounting for its presence in fact” (ibid: 68).
9. Ultimately, Secretary Jewell selected Alternative 1: No Action, siding with environmental groups against the land-swap that would have enabled the building of the King Cove-Cold Bay road. The Record of Decision (ROD) claimed that “the large number of species that are dependent on the isthmus would be irreversibly and irretrievably changed by the presence of the road.” (ROD, 2013).
10. Anishinaabe scholar Gerald Vizenor’s (1999) term *survivance* is helpful here. He defines survivance as, “an active sense of presence, the continuance of native stories, not a mere reaction, or a survivable name. Native survivance stories are renunciations of dominance, tragedy, and victimry. Survivance means the right of succession or reversion of an estate, and in that sense, the estate of native survivancy” (1).

References

- Aleutian Pribilof Islands Association, 2019. *History*. [online] Retrieved 23 May 2019 from: <https://www.apiai.org/departments/cultural-heritage-department/culture-history/history/>

- Angl s Grande, S.M., 1999. Beyond the ecologically noble savage: Deconstructing the white man's Indian. *Environmental Ethics*, 21(3), pp.307–320.
- Angry Inuk*, 2016. [film] Directed by Alethea Arnaquq-Baril. Canada: National Film Board. Retrieved from: www.nfb.ca
- Boyer, K., 2017. Saving the Polar Bear and Other Objects. In: S. Ray, K. Meier (eds.) 2017. *Critical Norths: Space, Nature, Theory*. Fairbanks: University of Alaska Press. Ch.5
- brown, a.m., 2016. *Emergent Strategy. Emergent Strategy: Shaping Change, Changing Worlds*. AK Press.
- Byerly, A., 1996. The Uses of Landscape. In: C. Glotfelty, and H. Fromm (eds.) *The Ecocriticism Reader: Landmarks in Literary Ecology*. Athens: University of Georgia Press, pp.52–68.
- Case, B. D. and Dorough, D. S., 2006. Tribes and Self-Determination in Alaska. *Human Rights*, 1, pp.13–14.
- Dunn, K., 2008. Historical Representations. In: A. Klotz, D. Prakash, (eds.) *Qualitative Methods in International Relations: A Pluralist Guide*. London: Palgrave Macmillan Limited. Ch.6.
- Elliott, W., 2017. Ravens' World: Ecoeegy and Beyond in a Changing North. In: S. Ray, K. Meier (eds.) 2017. *Critical Norths: Space, Nature, Theory*. Fairbanks: University of Alaska Press. Ch.2
- Fondahl, G., Filippova, V., and Mack, L., 2015. Indigenous Peoples in the New Arctic. In: Eveng rd, B. et al (eds.) *The New Arctic*. Springer International Publishing, pp.7–22. doi: 10.1007/978-3-319-17602-4.
- Gaudry, A., 2016. Fantasies of Sovereignty: Deconstructing British and Canadian Claims to Ownership of the Historic North-West. *Native American and Indigenous Studies*, 3(1):46. doi: 10.5749/natiindistudj.3.1.0046.
- Goeman, M. R., 2009. Notes toward a Native Feminism's Spatial Practice, *Wicazo Sa Review*, 24(2), pp.169–187. doi: 10.1353/wic.0.0040.
- Goldstein, A., 2008. Where the Nation Takes Place: Proprietary Regimes, Antistatism, and U.S. Settler Colonialism. *South Atlantic Quarterly*, 107(4), pp.833–861. doi: 10.1215/00382876-2008-019.
- Haycox, S., 2016. *Battleground Alaska: Fighting Federal Power in America's Last Wilderness*. University Press of Kansas.
- Higgins, M., 2017. Prospecting for Buried Narratives in Wrangell-St. Elias National Park and Preserve. In: S. Ray, K. Meier (eds.) 2017. *Critical Norths: Space, Nature, Theory*. Fairbanks: University of Alaska Press. Ch.14
- Howie, B., Lewis, N., 2014. Geographical Imaginaries: Articulating the Values of Geography. *New Zealand Geographer*, 70(2): 131-39.
- Huckin, T., Andrus, J., and Clary-Lemon, J., 2012. Critical Discourse Analysis and Rhetoric and Composition. *College Composition and Communication*, 64(1): 107–29.
- Johnson, M., 2011. Reconciliation, Indigeneity, and postcolonial nationhood in settler states. *Postcolonial Studies*, 14(2), pp.187–201. doi: 10.1080/13688790.2011.563457.
- Kantor, I., 2007. Ethnic Cleansing and America's Creation of National Parks. *Public Land and Resources Law Review*, 28, pp.41–64. Retrieved from: <https://scholarship.law.umt.edu/plrlr>
- Kauanui, K., 2016. 'A structure, not an event': Settler Colonialism and Enduring Indigeneity. *Lateral 5.1*. [online] Retrieved 20 May 2019 from: <http://csalateral.org/issue/5-1/forum-alt-humanities-settler-colonialism-enduring-indigeneity-kauanui/>

- Kollin, S., 2001. *Nature's State, Imagining Alaska as the Last Frontier*. The University of North Carolina Press.
- Nagar, R., 2014. Representation, Accountability, and Collaborative Border Crossings: Moving Beyond Positionality. In: *Muddying the Waters : Coauthoring Feminisms Across Scholarship and Activism*. University of Illinois Press, pp.105–123. Retrieved from: <https://muse.jhu.edu/book/35542>
- Simpson, A., 2007. On Ethnographic Refusal: Indigeneity, “Voice” and Colonial Citizenship. *Junctures*, pp.67–80.
- Smith, L., 2012. *Decolonizing Methodologies*. 2nd ed. London: Zed Books Ltd.
- Snelgrove, C., Dhmoon, R. K. and Corntassel, J., 2014. Unsettling Settler Colonialism: The discourse and politics of settlers, and solidarity with Indigenous nations. *Decolonization: Indigeneity, Education & Society*, 3(2), pp.1–32. doi: .1037//0033-2909.I26.1.78.
- Todd, Z., 2016. An Indigenous Feminist’s Take On The Ontological Turn: “Ontology” Is Just Another Word For Colonialism. *Journal of Historical Sociology*, 29(1), pp.4–22. doi: 10.1111/johs.12124.
- Tuck, E. and Yang, K. W., 2012. Decolonization is not a Metaphor. *Decolonization: Indigeneity, Education & Society*, 1(1), pp.1–40.
- U.S. Congress (U.S.C.), 1964. *The Wilderness Act*, Public Law 88-577 (16 U.S. C. 1131-1136) Retrieved from: <https://www.law.cornell.edu/uscode/text/16/1131>
- United States Fish and Wildlife Service (USFWS), 2013. *Final Environmental Impact Statement: Izembek National Wildlife Refuge Land Exchange/Road Corridor*. Appendix G Comment Analysis and Response Report. U.S. Dept. of the Interior. Retrieved from: https://www.fws.gov/uploadedFiles/Region_7/NWRS/Zone_1/Izembek/PDF/17%20Appendix%20G%20Comment%20Analysis%20Response%20Report.pdf
- United States Fish and Wildlife Service (USFWS), 2013. *Record of Decision, Izembek National Wildlife Refuge Land Exchange/Road Corridor Final Environmental Impact Statement*. Retrieved from: www.fws.gov/uploadedFiles/Region_7/NWRS/Zone_1/Izembek/PDF/rod_signed.pdf
- United States Fish and Wildlife Service (USFWS), last updated 2013. *Izembek National Wildlife Refuge: History of the Refuge*. [online] Retrieved 23 May 2019 from: <https://www.fws.gov/nwrs/threecolumn.aspx?id=2147524942>
- Vizenor, G., 1999. Preface. *Manifest Manners: Narratives on Postindian Survivance*. First Bison Books Printing.
- Voyles, T. B., 2015. *Wastelanding: Legacies of Uranium Mining in Navajo Country*. Minneapolis: University of Minnesota Press.
- Willems-Braun, B. 1997. Buried Epistemologies: The Politics of Nature in (Post) colonial British Columbia. *Annals of the Association of American Geographers*, 87(1), pp.3–31. doi: 10.4324/9781315256351-15.
- Wolfe, P. 2006. Settler colonialism and the elimination of the native. *Journal of Genocide Research*, 8:4, 387-409, DOI:10.1080/14623520601056240
- Zaitchik, A., 2018. How Conservation Became Colonialism. *Foreign Policy*, 16 July. Retrieved 20 February 2019 from: <https://foreignpolicy.com/2018/07/16/how-conservation-became-colonialism-environment-indigenous-people-ecuador-mining/>

Appendix A

Documents analyzed were taken from *Appendix G: Comment Analysis and Response Report*. A part of the U.S. Fish and Wildlife Service's Final Environmental Impact Statement (FEIS) on the Izembek National Wildlife Refuge Land Exchange/Road Corridor. All comments were submitted in 2012.

- A. Transcripts of the five public meetings with testimony by many individuals
 - A.1 Anchorage Public Meeting (May 3, 2012)
 - A.2 Sand Point Public Meeting (May 7, 2012)
 - A.3 Cold Bay Public Meeting (May 8, 2012)
 - A.4 False Pass and Nelson Lagoon Public Meeting (May 9, 2012)
 - A.5 King Cove Public Meeting (May 10, 2012)
- B. Comments submitted by cooperating agencies
 - B.1 King Cove Group (Agdaagux Tribe of King Cove, Belkofski Tribal Council, King Cove Corporation, Aleutians East Borough, City of King Cove) Letter to Secretary Salazar
 - B.2 King Cove Group Consolidated Comments
 - B.3 History of King Cove's Need for a Road to the Cold Bay Airport
 - B.4 State of Alaska Comments on Draft EIS Letter
- C. Comments submitted by Tribes and Alaska Native Corporations
 - C.1 Alaska Native Health Board
 - C.2 Agdaagux Tribal Council of King Cove
 - C.3 Aleutian Pribilof Islands Association
 - C.4 Belkofski Corporation
 - C.5 Belkofski Tribal Council
 - C.6 King Cove Native Corporation
 - C.7 Nelson Lagoon Tribal Council
 - C.8 Old Harbor Native Corporation
 - C.9 Qagan Tayagungin Tribe
- D. Examples of comments submitted by citizens and non-governmental organizations (citizens' names redacted to protect privacy)
 - D.1 U.S. Senator Lisa Murkowski
 - D.2 U.S. Representative Don Young
 - D.3 Della T.
 - D.4 The Wilderness Society
 - D.5 Dan R.
 - D.6 Lawrence and Viola Y.
 - D.7 Californians for Western Wilderness
 - D.8 Peter M.
 - D.9 Rebecca B.
 - D.10 Tanna L.
 - D.11 Allen E.S.
 - D.12 David M.
 - D.13 Coalition of Non-Governmental Organizations (Alaska Center for the Environment, Alaska Wilderness League, American Birding Association,

American Rivers, Audubon Alaska, Blue Goose Alliance, Center for Biological Diversity, ConservAmerica, Cook Inletkeeper, Defenders of Wildlife, Friends of Alaska National Wildlife Refuges, League of Conservation Voters, National Wildlife Refuge Association, Natural Resources Defense Council, Northern Alaska Environmental Center, Sierra Club, The Wilderness Society, The Wildlife Society, Western Lands Project, Wilderness Watch, Wildlands CPR, World Wildlife Fund)

E. Examples from organized form letter campaigns

- E.1 The Sierra Club
- E.2 Defenders of Wildlife
- E.3 National Wildlife Refuge Association
- E.4 Wilderness Watch