

September 19, 2014

To:
Southeast Region Planning
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From:
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A Letter about the Possible Road from Kake to Petersburg

Introduction

I write this letter in regard to the southeast Alaska transportation plan, specifically in regard to the Kake-Petersburg northern corridor road ("the possible road"). I am a 28-year-old resident of Petersburg, and a local fisherman.

I strongly disapprove of the possible road, and so I also disapprove of the southeast Alaska transportation plan. I base my disapproval of the possible road on two facts: first, that the arguments *in favor of* it are few and weak; and second, that the arguments *against* it are numerous and strong. In this letter, I'll support each of these claims.

The case in favor of the possible road is weak

There is only one argument that I have heard in favor of the possible road. It goes roughly as follows:

1. The possible road would create some economic benefit to residents of Kake.
2. Therefore, we should build it.

The premise (1) is unsupported, and the inference from (1) to the conclusion (2) is invalid. Cited in favor of (1) is the fact that residents of Kake would be able to travel to Petersburg via the road in order to satisfy some basic economic needs. However, it does not follow from this that the possible road would create some economic benefit. In order to determine whether there would be some economic benefit, you must make a comparative judgment: you need to determine how well economic needs would be satisfied by the possible road, and compare that with how well economic needs would be satisfied by any other possible plan. If there is a possible plan that doesn't involve

building a road from Petersburg to Kake and that would better satisfy economic needs, then (1) is unsupported.

I'm not going to undertake the study that would tell you the answer to that question. I'll only point out some facts that make it doubtful whether the possible road would best satisfy Kake's economic needs. First, Petersburg does not have as many services as Juneau and Sitka. Second, the possible road would not be navigable during the winter months. Third, maintenance of the road and supporting infrastructure would be expensive. These facts undermine the support for (1).

I'll now explain why (2) does not follow from (1). Notice that the possible road would involve two communities: Kake and Petersburg. As a result, if you want to know whether you ought to build the possible road, then you must consider how it would affect both communities. But notice that premise (1) mentions only Kake. It makes no claim about how the possible road would affect the residents of Petersburg. Therefore, you clearly cannot conclude that the possible road ought to be built merely from the claim that Kake residents would get some economic gain from it.

The case against the possible road is strong

There are two good reasons not to build the possible road. I'll briefly outline each of them. These reasons jointly provide a strong reason not to build it.

The first reason has to do with the cost of the possible road. It goes roughly as follows:

1. The possible road would cost a lot to build, support, and maintain.
2. Therefore, there is a reason not to build it.

I'll cite two facts in defense of the premise (1). First, the projected cost of building the possible road and supporting it with a new ferry shuttle system is somewhere around \$65 million. (In addition, we all know how easy it is for projects like this to exceed their projected costs. It is highly likely that \$65 million is an underestimate.) That's a lot of money. Second, it would be costly to maintain the possible road and the supporting infrastructure. I don't know exactly how much it would cost, and I doubt that anyone else does. But we all know that it would be a financial burden.

I'll not defend the inference from (1) to the conclusion (2), since I take it that it is uncontroversial. Whenever we have a project proposal, and we recognize that it is extremely costly, we all recognize that there is some reason not to pursue the project.

The second argument against the possible road has to do with the quality of life of the individuals who would be affected by it. It goes as follows:

1. The possible road would disrupt the lives of the residents of Petersburg and the City of Kupreanof.


2. Therefore, there is a reason not to build it.

I'll not defend the inference from (1) to (2), since I believe it is uncontroversial.

I will, however, present some considerations in favor of (1). First, the possible road would cut through the area where many of the residents of the City of Kupreanof live. This would clearly disrupt the way these people live. Second, the new ferry shuttle system would dominate large and important parts of the waterfront on both Kupreanof and Mitkof. Space would have to be made on both sides of the Wrangell Narrows. Third, the waters in front of Petersburg are already crowded with all kinds of marine traffic (e.g., commercial fishing vessels, sport fishing boats, recreational skiffs, Alaska state ferries, tug-and-barges, and float planes), and the new ferry shuttle system would add even more boat traffic.

Conclusion

In summary, it is questionable whether the possible road would benefit the people who it is meant to benefit, and it is definite that the possible road would adversely affect other people. So the road shouldn't be built.

SINCERELY,
Casey 
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Re: Draft Southeast Alaska Transportation Plan (SATP)

Dear Mr. Hughes:

Thank you for the opportunity to comment on the draft SATP. I submit the following comments on behalf of the City of Kupreanof (“Kupreanof”) pertaining to the draft SATP’s proposal to construct a northern corridor road from Kake to Kupreanof with a shuttle ferry connection to Petersburg (the “Kake-PSG Northern Corridor Road”). Kupreanof is a roadless community and participates in state and federal administrative processes to ensure the protection of Kupreanof’s local ordinances and policies that prohibit roads within city limits. Thus, while Kupreanof strongly supports the general goal of improving Kake’s access to services in larger communities, the DOT should focus primarily on increasing access to medical, commercial and transportation services in Juneau and Sitka through improved ferry service. Kupreanof opposes construction of the Kake-PSG Northern Corridor Road, and believes that a road and shuttle ferry connection to Petersburg would diminish rather than improve Kake’s access to Juneau and Sitka.

The Kake-PSG Northern Corridor Road would have significant detrimental impacts on the quality of life for Kupreanof residents in addition to failing to meet Kake’s access needs. Construction of the Kake-PSG Northern Corridor Road would also be inconsistent with Statewide Transportation Plan policies and goals, including the need to preserve ecosystem integrity, limiting negative impacts on environmental, social, economic and human health, and developing safe and cost-effective transportation systems for regional users. [See Draft SATP at 4, 7 (Policy 11)]. The need to address Kake’s access concerns in a way that is consistent with DOT Policy 11 is particularly critical because Kupreanof Island wildlife populations are known or suspected to be declining, meaning that the proposed road would likely worsen an already precarious situation for deer, martens, black bears and wolves. Kupreanof thus requests that you cease further planning for the Kake-PSG Northern Corridor Road.

Further, road construction, along with two new shuttle terminals and a shuttle ferry entails capital and long-term maintenance costs which do not need to be incurred in light of ferry system capacity. The current ferry schedule bypasses Kake on a number of northbound and southbound mainline and dayboat routes. The simple and obvious solution is to improve ferry service to Juneau and Sitka for commercial, transportation and medical services and to Petersburg for any specific southbound freight needs. Kupreanof thus requests that you cease planning on the Kake-PSG Northern Corridor Road and instead plan for improved ferry service as the preferred means for meeting Kake’s access needs through

alternatives that include mainline and dayboat service route improvements and consideration of replacement or shuttle routes using existing terminals as needed. This option would most effectively avoid and minimize the potential adverse environmental and socio-economic impacts associated with road construction alternatives.

I. The Kake-PSG Northern Corridor Road Adversely Impacts Kupreanof's Quality of Life

Alaska Statewide Transportation policy direction instructs the DOT to “[d]evelop transportation plans in close coordination with local communities to ensure transportation investment decisions reflect Alaskans’ quality of life values.” The Kake-PSG Northern Corridor Road will have substantial short-term negative quality of life impacts caused by road and shuttle terminal construction, and long-term impacts due to increased traffic. Kupreanof is a roadless community that is primarily accessible by small boat and has local ordinances that prohibit roads within city limits. Residents unanimously agree that the City should remain without roads and motorized vehicles. Roads and traffic can lead to unwanted development pressures and are incompatible with the lifestyles of Kupreanof residents.

The Kake-PSG Northern Corridor Road will have adverse quality of life impacts to subsistence resource users on Kupreanof Island caused by increased access and competition from non-rural resident sport hunting and fishing due to more roads. Every highway in Alaska that has opened a formerly remote area has increased hunting and fishing pressure. Kupreanof Island hunters are already concerned about the continued downward trend in deer abundance on Kupreanof Island. Other portions of the island are closed to non-resident hunting and resident and subsistence hunters have stringent bag limits and short seasons. The proposed road would change the existing access patterns and may lead to competition between rural and non-rural residents for subsistence resources.

II. The Kake-Petersburg Northern Corridor Road Will Not Meet Kake's Basic Access and Economic Development Needs

A. Sitka and Juneau are regional commercial, medical and transportation hubs

The purpose and need for the Draft SATP is, in part, to “[e]nsure the continuing opportunity to travel among the communities of Southeast Alaska to meet basic needs” The Draft SATP explains that “Kake has limited access to commercial centers for medical, goods, and transportation needs.” [Draft SATP at 10]. However, Petersburg is neither a regional commercial center nor transportation hub and does not provide the same level and types of medical facilities as Sitka and Juneau. Thus, the road alternative will not meet Kake’s basic needs relative to marine-based transportation systems that improve access to Sitka and Juneau and could have the unintended result of increasing travel time and expense incurred by routing travel to the larger communities through Petersburg.

For example, Petersburg only offers one northbound and one southbound flight per day. Conversely, Sitka has 3 southbound and 2 northbound daily flights, and Juneau offers twice as many flight connections as Sitka. Sitka and Juneau provide comprehensive medical

services through a non-profit tribal health consortium, Southeast Alaska Regional Health Consortium (SEARHC) facilities. SEARHC facilities in Sitka and Juneau provide access to a substantially larger number of doctors, medical services and rooms. The Petersburg Medical Center has 4 family practice doctors, limited facilities, and is a non-SEARHC facility. Requiring Kake residents to drive and shuttle to Petersburg, and then await air travel, will actually extend travel time to Sitka and Juneau, and thus reduce access to medical services relative to direct marine transportation routes. Finally, Juneau provides by far the best access to goods, with malls, numerous shops, and larger retailers such as Costco, Wal-mart, Fred Meyer, Home Depot and Office Max.

In sum, the final SATP should evaluate improved ferry service alternatives in light of some of Kake's most important needs for access to services that are predominantly available in Juneau and Sitka. By diverting travel to Juneau and Sitka through Petersburg, the Kake-PSG Northern Corridor Road fails to meet the policy goal of improving transportation opportunities based on demand, speed and affordability.

B. The Kake-PSG Northern Corridor Road will not improve regional commerce or contribute to local economic development

SATP goals and policies seek to identify system needs that address economic development, improve opportunities for commerce and provide infrastructure in order to encourage business and growth. [Draft SATP at 7]. The Draft SATP, however, mistakenly assumes that the Kake-PSG Northern Corridor Road will improve local economic opportunities in fisheries and tourism. For example, in its 2012 Total Project Snapshot Report, DOT indicated that the road connection would reduce the number of commercial fishing vessel round trips for fish deliveries. However, most Chatham Strait fishermen deliver directly to Petersburg in order to return home after opening or deliver to large capacity fish packers to efficiently transport fish, which also maximizes product quality due to reduced handling and the ability to immediately chill fish. Any assumption that a road connection would have economic benefits in terms of improving fishery product transport efficiencies should be verified through a comprehensive analysis of cost, availability and particularly capacity. An expensive road connection is not likely to realize efficiencies in fish transportation, particularly relative to existing private transportation and improved southbound mainline and/or dayboat ferry service.

The comments section in the draft SATP suggests that the road would bring more tourists to Kake. [*Id.* at 59]. Kupreanof believes that this is an assumption that is not supported in region-specific recreational analyses and studies, particularly in the absence of a formal travel demand analysis considering the potential for road-based recreation opportunities on Kupreanof Island. Rather, there is likely little demand for road-based recreation on Kupreanof Island and little reason to believe that a road connection would enhance Kake's marketability to the visitor industry relative to improved ferry access.

In general, recreation and tourism in southeast Alaska rely on and consist primarily of marine-based activities. The majority of commercial recreation is water-based. [USFS 2009a at 47]. The overwhelming majority of visitors to Petersburg arrive by cruise, ferry or private vessels and the primary economic driver of the local visitor industry – by far – is sport fishing. [Dugan et al 2008 at 72-73]. The other growth sector in southeast Alaska tourism in general is yacht travel in charter, private, and rented vessels. [*Id.* at 38]. These visitors make the most substantial expenditures per visitor in local communities. Thus, in general, the majority of visitors to the Kake-Petersburg area experience it from the water and only go

ashore in towns and communities, meaning that Kake's marketability to the visitor industry is best addressed by transportation system infrastructure that provides for increased marine access. Most land-based recreation on Kupreanof Island itself occurs during hunting season and road-based recreation use is otherwise low, implying a lack of demand. [USFS 2009a at 46]. Numerous opportunities exist for road-based recreation in Petersburg and on the northern Kupreanof road system near Kake, which are accessible using existing ferry terminals and mainline ferry service. [*Id.* at 46; USFS 2009b at 3-15, 16].

Thus, while it seems clear that increased visitor access would provide economic development opportunities for Kake, it is unclear how a road connection would stimulate visitor access when most visitors to southeast Alaska communities arrive by ferry, small cruise lines, or as independent boaters. Consequently, Kupreanof suggest that the final SATP would benefit from a more thorough consideration of actual demand for road-based recreation on Kupreanof Island and how improved ferry service would provide the best means to improve Kake's ability to benefit from the regional visitor industry.

C. The DOT can meet access and economic development goals by improving ferry service between Kake and other communities

The purpose and need statement for the SATP states that the SATP will "[e]nsure the continuing opportunity to travel among the communities of Southeast Alaska to meet basic needs and support the local and regional economy by providing the most financially sustainable transportation system that resources permit." [Draft SATP at 3]. It thus seeks to identify "opportunities to improve service where needed by reallocating existing resources, improving efficiency and reducing costs." [*Id.*]. As explained in the following discussion, Kupreanof believes that the basic medical, transportation and medical services needs for Kake will be better met by specifically targeting northbound access to Juneau and Sitka through improved ferry service rather than through an expensive road and shuttle ferry system to Petersburg. With regard to access to Petersburg, the road connection and shuttle ferry alternatives are a complex and expensive solution that could be avoided through additional southbound service using existing mainline ferries and dayboats about to become available to serve central southeast Alaska communities once the new Alaska Class Ferries begin operation on the northernmost routes.

Thus, Kupreanof recommends that you instead more fully develop and propose as your recommendation the "Kake Ferry Service Improvement Alternative" identified by the Federal Highway Administration (FHWA) proposed for the purpose of meeting Kake's access needs. This alternative would improve direct ferry service between Kake and Juneau, Sitka or Petersburg using existing Marine High Service ferries and terminals or add a new ferry to better serve the community. [78 Fed. Reg. at 4587]. The SATP's recommendation for major projects that meet regional transportation needs can include replacement vessels and potential service routes. [Draft SATP at 6]. Kupreanof thus requests that the final SATP develop a comprehensive improved marine transportation plan that implements improved ferry service between Kake and other communities.

First, because of its relationship to other ports, Kake is a convenient stop for mainline ferries on routes between Petersburg, Juneau and Sitka. Kake residents can be in Sitka in a matter of hours via ferry, whereas a plane connection to reach SEARHC facilities in Sitka via Petersburg requires multiple airport stops. Appropriate schedule modifications using existing mainline ferries would specifically improve the frequency and timing of service between Kake and the northern transportation hubs of Juneau and Sitka. Currently, there

are numerous existing ferry routes between Petersburg, Sitka and Juneau that bypass Kake. Scheduling changes and revisions to existing ferry routes can provide greater flexibility and improved travel opportunities for Kake residents at reduced user costs, and avoid the significant capital expenditures and environmental harms associated with the construction of the Kake-PSG Northern Corridor Road.

For example, Kake is currently connected to Juneau and Sitka through northbound mainline ferry service each Monday on the M/V Taku with an additional connection to Juneau on Fridays.¹ There is one return trip on the Taku from Juneau and Sitka arriving in Kake on Sunday and another departing Juneau on Tuesdays and arriving in Kake on Wednesday. [*Id.*]. This service could be increased greatly by adding Kake to the schedules for the M/V Matanuska and M/V Columbia. Under the summer schedule, the Matanuska bypasses Kake on northbound trips to Juneau on Sunday and Wednesday, and biweekly southbound trips departing Juneau also bypass Kake. [*Id.*] The Columbia bypasses Kake on biweekly northbound trips departing Petersburg and on its southbound trip. [*Id.*] The additional stop in Kake does not significantly delay these existing routes – it adds roughly four hours of ferry travel time to direct Juneau-Petersburg routes and three hours of travel time to direct Petersburg-Sitka routes.

The improved ferry service alternative could also include options that improve service through the use of dayboats such as the M/V Leconte or the M/V Fairweather. Under the summer 2014 schedule, Kake receives no dayboat service whatsoever.² Now that the new Alaska Class Ferries are planned for construction and service for northern community routes between Juneau, Haines and Skagway, however, there should be opportunities to improve service to central Southeast communities using existing ferries. For example, Kake could be included in the M/V Fairweather’s northern rural route, which stops in nearby Angoon, and in its weekly roundtrip between Juneau and Petersburg. Then, given ongoing plans to use Alaska Class Ferries to serve Haines, Skagway and Juneau, the LeConte should be available to provide at least additional weekly service between Kake and other central and northern southeast Alaska communities. Finally, another Alaska Class Ferry could almost certainly be constructed at a lower capital cost than the Kake-PSG Northern Corridor Road and shuttle terminals and ferry to serve central southeast Alaska communities.

III. Affordability and Safety: Transportation System User Concerns

A. The Kake-Petersburg Northern Corridor Road Will Lead to Hazardous Travel Conditions

Statewide transportation planning goals and policies seek to provide transportation infrastructure that is safe and reliable for Alaska residents. [Draft SATP at 4 (improve reliability and safety), 7 (Policy 9(safety))]. Kupreanof is concerned that winter road travel on the Kake-PSG Northern Corridor Road will instead be unreliable and dangerous. There is a clear risk of landslides and avalanches in the project area – a 2009 analysis of the Kake-Petersburg Intertie along the same route indicated that “[a] catastrophic failure should be expected every three to five years.” [SEC. 2009 at 6-17]. The clear potential for winter road closures, wildlife-vehicle collisions, and the occurrence of other incidents that can interrupt travel on a one lane road make clear that ferry travel will provide the safest and most reliable transportation system. The final SATP should show that the DOT considered and compared

¹ See www.dot.state.ak.us/amhs/doc/schedules/summer14/SEMain_S14.pdf.

² See www.dot.state.ak.us/amhs/doc/schedules/summer14/UpperSEDayBoats_S14.pdf

the respective transportation system safety between ferries, air service and forest highways and consider the number of days that road closures could occur because of inclement winter weather and other problems.

B. User Affordability: The Northern Corridor Road will be more costly and less accessible for transportation system users

The Kake-PSG Northern Corridor Road fails to meet SATP's goals in terms of affordability and cost-effectiveness for transportation system users. For example, the road connection alternative will clearly increase costs to those Kake residents traveling without vehicles. Walk-on passengers will have to incur additional ground transportation costs in order to use the shuttle ferry system. For example, the current one way fare for ferry travel to Sitka and Juneau are \$37 and \$66, respectively. In order to use the shuttle system, passengers would have to incur ground transportation costs and then arrive in Petersburg, where ferry costs are \$45 to Sitka and \$66 to Juneau. Using an air connection would be considerably more expensive - air travel costs are roughly \$170 for a one way trip to Sitka or Juneau. The Draft SATP does not plan for public transportation between remote shuttle terminals, meaning that the road option will substantially reduce access for walk-on passengers from Kake relative to the current system or a system with improved ferry service. The absence of planning for ground transportation and the shuttle is a significant problem, and there is a particular need for an analysis of the market and frequency of service.

IV. The Kake-Petersburg Northern Corridor Road Does Not Meet the Draft SATP's environmental responsibility goals and policies

Alaska Transportation Plan Policy 11 directs transportation system planners to “[p]reserve the integrity of the ecosystems and the natural beauty of the state, limit the negative impacts and enhance the positive attributes – environmental, social, economic and human health.” [SATP at 7]. The Kake-PSG Northern Corridor Road proposal is inconsistent with the DOT's environmental responsibility goals and policies, particularly in comparison to improved ferry service alternatives, because of adverse environmental impacts on watersheds and fish, wildlife and roadless area values.

A. The Northern Corridor Road Will Adversely Impact Watersheds and Fish

Northern Kupreanof Island watersheds make substantial contributions to subsistence, recreational and commercial fisheries, with numerous primary and secondary salmon and sportfish producer streams. The Kake-PSG Northern Corridor Road is likely to adversely impact water quality and fish habitat through erosion, altered drainage patterns, increased stream temperatures and fish passage restrictions. For example, erosion can contribute significant sediment into project area watersheds and impair water quality at various points, further altering fish habitat. [USFS 2009a at 10, 35]. Road stream crossings directly affect fishery resources by fragmenting habitat and preventing migration during several life stages. [Id. at 33]. Kupreanof Island already has an extensive network of deficient culverts that block fish passage in high quality fish habitat. The route will likely add roughly 54 Class I and II stream crossings and consequently fish migration barriers. [Id. at 35; SEC 2009 at 3-12]. There already are 41 deficient culverts in the northern corridor area and 75 deficient culverts in the Kake area. [USFS 2009a at 31]. It is unclear whether or when funding will be available to remedy these problems. [Id. at 34].

Roads also are likely to affect salmon populations due to a lack of comprehensive survey data, particularly late season-verification of stream class boundaries between class II (known fish-bearing) and class III (non-fish-bearing) streams. There has been recent evidence of salmon utilization of class III stream segments, demonstrating the inadequacy of existing classifications. Undetected class III stream utilization by salmon creates conditions where Best Management Practices and other mitigation measures fail to provide intended protections for headwater tributary productivity and for fish populations that may seasonally access these segments.

The Kake-PSG Northern Corridor road will also entail access impacts to important salmon producing watersheds on northern Kupreanof Island. The road could substantially increase access to high use steelhead fishing locations such as Petersburg Creek and affect Kupreanof Islands's steelhead populations which are generally stable but at low population levels. [USFS 2009b at 3-4]. Sport fishing alone can have a profound effect on fishery resources, especially relatively small fisheries, meaning that increased motorized access may have adverse impacts. [*Id.* at 3-5; USFS 2009a at 34].

B. Terrestrial Habitat and Wildlife Impacts

Kupreanof values local wildlife populations for subsistence, wildlife viewing, other human consumptive benefits, and their intrinsic existence values. The Kake-PSG Northern Corridor Road risks adverse impacts to numerous wildlife species through habitat loss and fragmentation,³ traffic disturbance, collisions with vehicles and other direct and indirect impacts of increased human activity such as increased trapping and hunting pressure. Over the past 15 years, ADF & G and other biologists have expressed concerns about increasing road density in various portions of Kupreanof Island because of adverse impacts on wildlife habitat suitability.

In particular, there are significant concerns about how increased access to northeast Kupreanof Island and high road densities would facilitate increased legal and illegal hunting pressure and adversely impact deer, black bears, wolves and martens. All of these wildlife populations are known or believed to be at low levels. The U.S. Fish and Wildlife Service has recently determined that listing the wolf under the Endangered Species Act may be warranted. [79 Fed. Reg. at 17993]. Road density increases arising from the Kake-PSG Northern Corridor Road were identified in comments as a potential threat to the species.⁴

³ The Kake-PSG Northern Corridor Road directly impacts an important regional wildlife corridor – the “pinch point” between Portage Bay and the northern portion of the Duncan/Salt Chuck Wilderness and bisects a Tongass National Forest Old Growth Reserve, undermining the habitat quality of these areas for wildlife, creating new habitat edges and reducing the amount of interior forest habitat.

⁴ See www.regulations.gov/#!documentDetail:D_FWS-R&-ES-2012-0093-0506:

Improved access as a result of the inter-tie road is likely to increase both legal and illegal hunting and fishing pressure, to the possible detriment of some currently utilized species. As a result, increases in both deer and wolf mortality can be anticipated. Even at current access levels, I am aware of two instances in the fall of 2003 where wolves were shot and abandoned on the Portage Bay road system.

Although road densities do not currently exceed established recommendations at the smaller project level, human access, hunter and trapper harvest, and illegal kill may lead to wolf mortality concerns within the province. ... It is important to note that while road densities are below established thresholds when viewed at the larger scale, when viewed at the smaller project scale, road densities in some portions of the province already exceed the established guidelines for wolf mortality.

Deer and marten populations are also at low levels on Lindenberg Peninsula – in 2013, ADF & G proposed additional harvest regulations for both species to address ongoing risks associated in large part with the extent of the existing transportation system.⁵ In particular, the agency cited a “[h]igh potential for overharvest” of martens due to continued reductions in marten habitat carrying capacity, increased road density, little remaining refugia, and the demonstrated slow recovery of nearby marten populations on Kuiu Island. [*Id.*].

Black bear populations on Kupreanof Island and adjacent islands are also believed to have declined over the past decade. [Lowell 2011 at 105]. The cause is unclear, but could be a result of overharvest, environmental factors, or a loss of habitat carrying capacity due to logging. [*Id.*]. ADF & G anticipates that managing black bear populations will be a “formidable challenge.” [*Id.*]. Construction of roads into roadless black bear habitat will increase human access, leading to increased mortalities through legal hunting kills in defense of life and property, illegal kills, and road kills. Traffic and road construction activities also may result in substantial disturbance to bear foraging activities - bears have the highest vulnerability to human activities in low elevation riparian areas during summer months and often travel from these areas to higher elevation or forested areas on a daily basis. Creek crossings in particular can have substantial impacts on bear foraging behavior.

Finally, sensitive or protected bird species such as Queen Charlotte goshawks are known or suspected to occur on portions of Kupreanof Island. [USFS 2003 at C1-158]. There are numerous bald eagle nests along the northeast Kupreanof Island shoreline, meaning that road construction activities could result in substantial disturbances to bald eagles at sensitive life stages, reducing foraging opportunities and species productivity. [*Id.* at C1-157; USFWS 2007 at 8.].

C. Roadless Values

The Kake-PSG Northern Corridor Road will substantially reduce the environmental values associated with roadless, intact environments by substantially impacting IRAs 211 (North Kupreanof), 212 (Missionary) and 213 (Five Mile). [79 Fed. Reg. 43708]. The route runs along the shoreline of the Five Mile IRA, runs adjacent to the Missionary IRA, and entirely bisects the North Kupreanof IRA. [*Id.*]. The final SATP should thus specifically consider northern Kupreanof Island roadless areas and roadless values, such as the natural integrity and appearance of the areas and opportunities for solitude in each affected IRA. The Five Mile IRA, for example, is mostly in a natural state and has been historically used by many Petersburg residents for deer hunting. [USFS 2003 at C-1-157-159]. The proposed road would adversely affect numerous roadless area values identified in the 2001 Roadless Area Conservation Rule, including:

- (1) High quality or undisturbed soil, water and air, particularly in terms of maintaining healthy watershed functions and fish and wildlife populations;
- (2) Diversity of plant and animal communities, particularly in terms of conserving native biodiversity;

⁵ See e.g. www.adfg.alaska.gov/index.cfm?adfg+gameboard.meetinginfo&date=01-11-2013&meeting=sitka (Tab 5 –Peterburg Area GMU 1B & 3, Overview and proposals (proposing additional deer harvest restrictions and showing low deer pellet densities on northern Lindenberg Peninsula, and proposing motorized access restrictions for marten trappers).

- (3) Habitat for sensitive species and species dependent on large, undisturbed areas of land;
- (4) Primitive and Semi-Primitive Non-Motorized classes of dispersed recreation opportunities such as camping, wildlife viewing, hiking, hunting and fishing;
- (5) Natural appearing landscapes with high scenic quality and
- (6) Other locally identified unique characteristics, including areas prized for exceptional hunting and fishing opportunities. [See 66 Fed. Reg. at 3246-3247].

D. Conclusion: Kake-Petersburg Northern Corridor Road fails to meet environmental responsibility Goals and Policies

As explained in the preceding paragraphs, Kupreanof Island deer, marten, wolf and black bear populations are at low levels, and the various environmental impacts associated with the road – direct habitat loss, impacts to reserves and corridors, and increased hunting and trapping pressure – are a significant concern. The road and construction activities will also adversely impact anadromous fish bearing streams and avian species. All of these impacts will occur in those remaining portions of Kupreanof Island that provide roadless refugia for wildlife. Conversely, improved ferry service alternatives implicate none of these environmental impacts, and thus are the best way to meet the DOT’s environment and quality of life policies.

V. The capital costs of the project are too uncertain and likely substantially underestimated

The Draft SATP’s reliance on planning level estimates rather than an independent engineering study raises considerable uncertainty whether the Kake-PSG Northern Corridor Road will meet SATP goals for transportation system choices that are cost effective for system users or the state. The absence of an independent engineering study that can measure costs accurately is a significant concern given the broad variability in estimated costs. The draft indicates that its estimates are preliminary and will be refined during project development. [Draft SATP at 42]. However, there is enough information available to indicate that the Kake-PSG Northern Corridor Road will be at the higher end of the estimates, and a comprehensive study is necessary prior to any further commitment of public resources.

Costs will increase if tunnels or pass crossings are necessary. According to the draft SATP, the majority of system roads cost between \$.7 million for roads in “gentle country” to in excess of \$15 million per mile for roads that cross rugged country. [Draft SATP at 42]. The projected average cost for the majority of road segments under the plan is highly variable – between \$2 million and \$6 million per mile. [*Id.*]. In general, the northern route crosses rugged terrain and significant portions of the route are situated on steep slopes in heavily forested areas. [SEC 2009 at 2-4,-6, -22]. The terrain characteristics thus suggest that significant portions of the 45 mile route will entail costs in excess of \$2 million per mile and potentially ranging between \$6 million and \$15 million in particularly steep and rugged segments.

However, only \$40 million has been appropriated to construct or improve 45 miles of road in order to develop a single lane, unpaved roadway and bridges. [Draft SATP at 11]. It may require at least the \$160 million estimated to be necessary to develop the Kake-PSG Northern

Corridor Road into a two lane, paved road that may be necessary to accommodate small passenger cars. [Draft SATP at 44-45].

The estimated cost of the two ferry shuttle terminals and ferry is another \$30 million with \$3 million in estimated annual maintenance costs. [Draft SATP at 45]. Again, a more detailed estimate should be provided in the final SATP. Also, the failure of a similar road/shuttle ferry proposal – the south Mitkof terminal and shuttle ferry M/V Prince of Wales – is an additional reason for caution. The project failed because of low ridership and funding shortfalls and raises serious questions about the feasibility of this project. The small number of drivers who would use the road simply does not justify the capital cost and risk of failure, especially relative to the likely larger number of Kake and central southeast Alaska residents who would benefit from additional mainline and dayboat ferry service.

VI. Conclusion

For the above reasons, Kupreanof requests that you cease planning on the Kake-PSG Northern Corridor Road, and instead proceed with a final SATP that seeks to enhance economic development opportunities in central southeast Alaska and improve Kake's access to other communities through additional ferry service.

Sincerely,

Paul Olson, Attorney at Law

REFERENCES

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P.O. Box 961
Haines, AK 99827
September 10, 2014

Alaska DOT & PF
6860 Glacier Highway
Juneau, Alaska 99801-7999

Re: Southeast Alaska Transportation Plan

Hello:

This letter documents my feedback on the above plan. My comments focus on the proposed Juneau Access Road.

1) **The proposed Juneau access road has inherent safety problems.** Obvious dangers include snow avalanche and rock fall. People may get trapped in avalanches or stranded behind them. I think the road will have a much higher risk in winter, though summer travel may pose rock fall risk.

This project is similar to the North Cascades Highway completed in 1972, Washington State. That highway is closed 5-7 months of the year due to slide hazard, though it was planned as a year-round road across the Cascade Mountains. The following excerpt is from the Washington Department of Transportation website www.wsdot.wa.gov/Traffic/Passes/NorthCascades, under "frequently asked questions".

Why not keep the highway open all winter?

We did keep it open one winter - the drought of 1976-77.

We cannot physically keep the North Cascades Highway open all winter. The North Cascades Highway has avalanche chutes that are more than 2,000 feet long. Even if a *couple inches of snow* slides, the chutes can dump a 20-foot-deep avalanche on the highway in a matter of minutes. Couple that with the fact that the highway has among the most avalanche chutes of any mountain highway in the country, and there's no way anyone could provide a safe highway, short of putting the route in a tunnel (which would eliminate all of its appeal, even if someone had that much money).

The proposed Juneau access road has more avalanche chutes than the North Cascades highway. Our kids will be traveling this road for school sports and I fear for their safety.

1) The proposed Juneau access road makes no provision for walk-on passengers.

The proposal includes no provision for a safe and secure place at the Kazehin ferry terminal site for waiting walk-on passengers, nor does the plan include provision for a transport link for foot passengers from Kazehin to Juneau. The Juneau access road is an incomplete proposal with inherent risks to stranded passengers, especially the elderly and young in inclement weather.

3) The proposed Juneau access road is unreliable due to likely snow, rock and debris slides. Many Haines residents travel. Both drivers and foot traffic from Haines risk missing their connection with departing flights due to road conditions.

The ferry, on the other hand, is able to ply the waters of Lynn Canal even in severe weather (unlike flying or driving). FERRYS ARE RELIABLE.

4) I believe your costs for both construction of and maintenance of the proposed Juneau access road are underestimated. I don't think sufficient engineering exploration has occurred to determine the magnitude of the project cost, nor the enormity of maintenance and repair costs.

What will happen if DOT has insufficient funds to maintain and keep the Juneau road open year-round? How will people then move between Juneau and Haines/Skagway if the road is closed (as it is for the North Cascades Highway)? Will the citizens of Alaska end up with a high-priced road that is useable only part of the year (by virtue of maintenance and/or construction costs)?

Any underestimate of construction and/or maintenance costs will certainly affect the rest of SE transportation system. At the Haines meeting, Andy Hughes said that there is declining State and Federal transportation funding. Given that, will future DOT budgets be sufficient to maintain the road? Can we build the road if Federal funding declines?

5) The proposed Juneau road presents an economic burden for foot passengers bound for Juneau. Without a through-link to Juneau, foot passengers will be subject to whatever free enterprise dictates. It could be upwards of several hundred dollars if the trip from Kazehin to Juneau is by cab.

6) There is no public consensus on this project. Andy Hughes indicated at the Haines SATP meeting that some people wanting to drive out of Juneau are pushing for construction of the Juneau road.

The Juneau road seems like a massive project with great economic and safety risks for the few people who can already board a ferry and achieve the same end result.

On the other hand, this road represents a huge loss to the people of Haines and Skagway both in terms of safe reliable travel to Juneau as well as potential economic impact if we lose cruise ship dockings due to environmental disturbance to the now-pristine Lynn Canal waterway.

7) I believe there is a better mix of Alaska Class Ferries and schedules that will provide affordable, safe and reliable transportation between Haines/Skagway and Juneau. I think more study is needed. The proposed Juneau access road is an economic and social sink hole.

I appreciate your planning efforts, and I believe ferries are our safe and reliable transportation for SE Alaska. The optimum economic mix of ferries, ports, and schedules just has yet to be explored.

Diane La Course

ADOT&PF – Southeast Region Planning

PO Box 112506

Juneau, Alaska 99811-2506

This letter is in response to the proposed plan for the KAKE-PETERSBURG CORRIDOR ROAD.

I address two concerns: SAFETY and NEED and COST.

SAFETY: EXAMPLES of real dangers of driving an automobile or truck the 51 miles both ways between Kake and Petersburg year round on a one way road. Several serious concerns arise:

Weather could and will bring deep snows whereby plowing would be a very difficult if not impossible task thus stranding vehicles in cold conditions and with few options.

Weather could and will bring heavy rains causing landslides and windfalls blocking the road for indeterminate periods of time, causing possible accidents and injuries, stranding vehicles in cold wet conditions for untold hours.

Weather could and will bring many periods of freeze and thaw during the winter months causing hazards if not impossible driving conditions and the likelihood of vehicles being stranded for indeterminate periods of time.

Visibility for driving in the darker times of the year when there are few hours of daylight increases the possibility of accidents and death of people and animals.

The above examples are but a few of the most obvious and do not include the possibility of insobriety as a contributing factor to accidents which would need emergency help.

NEED: ALTERNATIVE SOURCES of ENERGY:

To my knowledge, there have not been serious studies as to the possibility of using the three most obvious sources of alternative energy for Kake: HYDROPOWER - WIND POWER – SOLAR ENERGY. A combination of these three would be much less expensive, less disruptive to people and to the environment. And the best part is that they could be owned by the City of Kake, providing jobs and local ownership and management. With the forecast for diminished population this would be reasonable.

COST:

The cost of financing the road construction, the building of a shuttle ferry, and a new terminal, each accompanied with year round maintenance personnel and upkeep equipment, is just mindboggling. It seems too fanciful to believe. The site for location for the new terminal at the narrow mouth of Wrangell Narrows where extreme tidal forces occur for several hours twice daily year-round, causes deep concern. In addition to being a dangerous navigational site it would be an eyesore in a breathtaking beautiful area opening out into the wide expanse of Frederick Sound.

The question has to be asked: Has a comprehensive market survey been done that would demonstrate that the NEED for this road and ferry? Is there a real need for this type of extensive disruption?

Is there a more practical solution to the need for cheaper power and for better access?

I hope these remarks reach open minds ready to consider better solutions. I know spending less money than that amount already budgeted is not the usual agency response to suggestions of less expensive and more practical solutions.

Sincerely,

Pauline S. Lee

September 30, 2014
PO Box 53
Tenakee Springs, AK 99841

RE: Comments on Southeast Alaska Transportation Plan

Gentlefolk:

As a resident of Tenakee Springs, I'm appalled to once again see the same tired and absurd plans for building roads across Chichagof Island. These plans are not something that we want in Tenakee. We have consciously chosen to keep our community roadless. But, even if we hadn't, these roads would increase our transportation costs, requiring us to own vehicles in Tenakee or to store them at the ferry terminals. Driving the proposed road system would be far more hazardous than boarding a ferry in Tenakee, and for much of the year, would be dangerous and frequently impassable due to snow. Unless DOT chooses to spend a fortune plowing long stretches of road whenever it snows, all the roads proposed to come to Tenakee Inlet will be impassable for many months of each year. The cost of maintaining any road from Hoonah to Tenakee Inlet would be very large, and the traffic very light even when it wasn't snow covered. Plus, we don't want a road connecting Tenakee to the ferry system.

The idea of a road at the upper end of Tenakee Inlet crossing to Pelican is a travesty. Again, such a road would have to go very high, and the top of the Inlet is much colder and snowier than anything near town. All such a road would do is devastate a pristine and spectacular wild area, with little benefit to Pelican or Hoonah and none to Tenakee.

Putting a road up the Kadashan drainage is an even worse idea. This is a LUD II area and a place whose wilderness character is deeply engrained in the hearts of our community members. And, putting a shuttle ferry at each end of such a road is ludicrous—if such ferries weren't available all day long, they'd be pretty useless, and to shuttle back and forth would be hugely expensive. Plus, most of us truly appreciate that it is somewhat difficult to get to our community. We like it that people who come here really want to be here and had to work at it.

I urge you to eliminate all these bad ideas from the plan now, and to keep them out in the future. Tenakee can do quite well with our current ferry schedule for a very long time, and the character of our town, would be permanently and negatively altered if any of these proposals were to occur.

Sincerely,

Steve Lewis

ADOT&PF - Southeast Region Planning
P.O. Box 11250
Juneau, Alaska 99811-2506

To Whom It May Concern:

Upon moving to Alaska, I discovered a wild and beautiful place where I experienced wilderness not found anywhere else. My exuberance tempered only by old-timers' remorseful grumblings for the loss how much better it used to be. My disenchantment helped me realize the same old-timers who praised the past allowed the development that diminished it.

Now, this generation of Alaskans faces a similar dilemma. The 2014 Southeast Alaska Transportation Plan (SATP) proposes to degrade several of Southeast Alaska's most unique places.

Obviously, building a road to the Katzeihin valley benefits Coeur Mining, Inc. It does this by transferring the revenue that local Air and Marine transportation services made supporting the mine to corporate shareholders. More importantly, the avalanche terrain and adverse weather conditions along Lynn Canal will strand people at the Ferry Terminal and in town, likely for days. When the road is open, those conditions can only be compared to the Seward Highway along Turnagain Arm, well known as the deadliest highway in Alaska. Finally, placing the road so far from Juneau will disenfranchise pedestrian and bicycle users of the Ferry system. Increasing the revenue of a Chicago based corporation does not offset the these costs or severely diminishing the wildness and beauty of Berner's Bay and the Katzeihin watershed.

A road from Sitka to a ferry terminal in Warm Springs Bay suffers from many of the same problems; strandings in winter, no foot traffic, no bicycle traffic, and highway fatalities. Combine these costs with the destruction of one of the most pristine and unique watersheds in all of Southeast Alaska, this project is even more ill advised.

The SATP from the Department of Transportation threatens the one unifying trait of Alaskans, our pride in living close to the natural world. It is possible to move into the future while preserving the spirit and pride Alaskans have in their relationship to the wilderness. Innovative thinking that harnesses that pride, not rehashing the 60 year old policies of the lower 48, is what we need to move forward and keep Alaska unique and wild.

Sincerely,



Brian J. Lieb
PO Box 240165
Douglas, AK 99824

Lynn Canal Conservation
PO Box 964
Haines, AK 99827
Lynncanalconservation@gmail.com

Submitted via email on September 29, 2014

ADOT&PF – Southeast Region Planning
P.O. Box 112506
Juneau, Alaska 99811-2506

RE: SATP 2014 Comments

General Comments

Lynn Canal Conservation (LCC) is a grassroots conservation organization based in Haines. We participated in the current SATP process with comments filed in December 2008, July 2009, and November 2011. Our comments have consistently stated a preference for community-to-community ferry service, and have consistently opposed proposed new road segments in general, and strongly opposed a Juneau road extension in particular because it will be a costly, unsafe and unreliable dead-end road. Even though public sentiment has consistently and strongly favored improving Alaska Marine Highway service and consistently and strongly opposed dead-end roads with shorter ferry links, the Alaska Department of Transportation (DOT) still proposes to dismantle public transportation between communities, requiring all Alaska Marine Highway System (AMHS) passengers accessing Juneau from Haines and Skagway to travel with a vehicle. Our comments will focus on how the proposed changes to the Upper Lynn Canal transportation corridor will impact our members and community, and the overall health of the AMHS. We will also discuss how the preferred alternative is incompatible with stated SATP goals, articulated SATP mission statement, and purpose and need, and also with Alaska Statewide Transportation Plan policies.

Available Transportation Funding and the Need for Fiscal Constraint

The SATP acknowledges as fact that state and federal transportation funds are decreasing (page 2). Because of this fact, the state transportation plan articulates a need for fiscal constraint and says that a Juneau road “may or may not be completed” due to insufficient funds. (2008 Alaska State Transportation Plan, page 21). In fact, during the current SATP planning process, DOT admitted that projects “exceeding \$300 million over the next ten years are not considered realistic.” (SATP Plan Assumptions, 2009). In spite of these acknowledged financial realities, building the half-billion dollar Juneau road extension incredulously remains a “SATP priority” (page 10). Where will the money come from? What other essential projects in Southeast and around the state will not receive funding? While discussing the necessity for sustainability, on one hand, proposing building an unpopular road with no financial plan to ensure construction will be completed is ludicrous.

Specifically, it is anticipated that an East Lynn Canal (ELC) road would be completed in 2020 (page 12). Assuming construction begins in 2015, the six-year project would require a capital expenditure of \$96.8 million each year. (\$581 million total price tag, SATP page 18, divided by 6). But the Plan states that only \$61 million will be available per year for **all** new construction (page 14). If the entire \$61 million allocated for new construction is spent on an ELC road extension through “completion” in 2020, only \$366 million would be available. Where does the additional \$200 million come from? Even if every construction dollar available were spent on this one project over the next 6 years, the

funding is insufficient. Sinking dwindling transportation dollars into the half-billion dollar Juneau dead end extension that has insufficient funds to complete is contrary to the SATP goal “to ensure that future transportation investments are in the public interest” (page 5). In this context, the word boondoggle seems entirely appropriate.

The SATP rationalizes the state’s ability to finance this “priority” by making the unrealistic “key assumption” that “necessary capital and operating funding will be available for the 20 year plan period” (page 9). This “assumption” clearly is not supported by the fiscal reality of declining funding admitted on page 2.

The 2020 timeframe for completing this boondoggle is also not grounded in reality. For example, another “key assumption” is that environmental reviews will be on schedule. However, the Juneau Access EIS was expected out in January, and is currently more than a half-year behind schedule. The Plan assumes the contract for the first segment will be awarded this year (page 18). There is no mention of the likely possibility of another court challenge, which would further delay the project for years. In this regard, the SATP premise that “assumptions tend toward an optimistic scenario” (page 9), is incredibly understated. A better characterization would be that SATP assumptions are both unrealistic and fiscally irresponsible.

Impacts to Haines Residents from Building an East Lynn Canal Road

The September 10, 2014 Haines public meeting mirrored the Skagway public meeting in that opposition to an ELC road was strongly expressed by nearly every speaker, in a standing room only crowd. The reason for the unpopularity of an ELC road extension is that if constructed, Juneau access would diminish, would be unsafe, and would be unreliable. It would diminish access for walk-on passengers at all times, and diminish access for those choosing to travel with a vehicle during avalanche season and during numerous land, rock, and debris slide events.

DOT has yet to analyze the percentage of ferry passengers who travel without vehicles. A McDowell report indicates that walk-on traffic accounts for 45% of passengers. (McDowell Marketing and Pricing Study, 2000, page 65). This large percentage of ferry users will be forced to fly to Juneau, as no public transportation will be provided between Katzehin and Juneau. (The statement that commercial bus service “may be provided” -page 13 - is inconsistent with information provided in the 2006 Juneau Access EIS, and inconsistent with a lack of commercial bus service at Auk Bay and Hollis). Walk-on passengers will have to fly, weather permitting, more than tripling the current AMHS cost to Juneau. This removes this “preferred low cost mode of passenger travel between communities.” (SATP Plan Assumptions, 2009, page 6). As previous SATP’s have acknowledged, weather frequently makes commuter air service unreliable, sometimes for many consecutive days. Consequently, traveling opportunities for this large segment of the traveling public will both decrease and become substantially more expensive.

The last available Juneau Access EIS acknowledges up to 34 days of road closures due to avalanche danger, making an East Lynn Canal Road unreliable for the 55% of AMHS passengers who do travel with a vehicle. Since that EIS was published, a geotechnical report identifies an additional 112 geological hazards consisting of land, rock and debris slides. (Zone 4 Geotechnical Investigation, Golder, December 2006, page 34). As yet there is no quantification of additional closures due to these acknowledged hazards. Since none of these events are predictable, those residents traveling to Juneau for medical or business appointments, or for jet travel, will no longer have reliable access. This bleak scenario of decreased, unreliable, unsafe, and more expensive access to Juneau will bring many hardships to the residents of Haines and Skagway. For example, 19% of Haines and 16% of Skagway

residents travel to Juneau for medical reasons (2006 FEIS, Appendix I, pages 19 and 20). Reliable access to necessary healthcare is another reason why Haines and Skagway so vehemently oppose an ELC road.

Impacts to the Rest of the Alaska Marine Highway System

The importance of the ports of Haines and Skagway to the viability of the entire ferry system remains unanalyzed in the SATP. However a report prepared for the Municipality of Skagway by the McDowell Group in June 2014 makes clear that “Haines and Skagway are two of the highest-volume ports in terms of passenger, vehicle and freight traffic and in terms of revenue contributed to the overall system.” (*North Lynn Canal Ferry Service Analysis* page 1). Additionally, “the Lynn Canal market is an economic opportunity for the system that can help underwrite the essential service provided to lower volume communities.” (id.) Analyzing the revenue impacts to the rest of the marine highway from removing the ports of Haines and Skagway is a major failing of the SATP analysis.

An Equitable AMHS Rate Structure is Still Missing

The need for an equitable fare system to reduce AMHS costs was identified in the 1999 SATP. (LCC November 2011 SATP comments). That this obvious means for creating an AMHS that would need a smaller state subsidy remains absent speaks volumes to DOT’s pro-road bias. Obviously the AMHS can be made more cost effective by having an equitable fare structure. (LCC Feb 2004 SATP comments, p. 5) For example, the McDowell report shows adult Haines-Skagway per nautical mile fares are the highest in the system at \$2.38. Conversely, Petersburg-Sitka fares are only 29 cents per nautical mile. Haines-Skagway vehicle fares are also the highest at \$3.77 per nautical mile, with Petersburg-Sitka fares at 60 cents per nautical mile. On the basis of this information, it is logical to conclude that Haines-Skagway fares are subsidizing Petersburg-Sitka fares. Continuing to ignore an erratic and nonsensical AMHS rate structure while advocating that the AMHS is too costly to maintain and operate is absurd.

The Alaska Class Ferry (ACF)

Utilizing the two new ACF’s in the Upper Lynn Canal will substantially reduce costs for the AMHS. According to the McDowell *North Lynn Canal Ferry Service Analysis* cited above, the average cost per mile for Lynn Canal ferry service in FY 2012 was \$527. ACF ferry costs per mile are projected to be \$173 for Haines to Juneau and \$336 for Haines to Skagway (page 7). Even with a \$527 per mile cost, the 2006 Juneau Access FEIS found that **existing ferry service was more economical** to the state over a 30-year period than building an ELC road. (\$61 million in state costs versus \$88 million, 2006 Juneau Access FEIS page 4-41) With ACF’s coming on line soon, it makes absolutely no sense to invest scarce transportation dollars in the debacle of an East Lynn Canal road.

Incompatibility with Stated SATP Purpose and Need, Mission Statement, and Goals

DOT went through a multi-year public process (from 2008 through 2011) of taking input on an appropriate mission statement, goals, and purpose and need. At the very least this draft SATP should be consistent with the mission statement, goals, and purpose and need statement generated through that process. However, the contrary is true.

Purpose and Need: The SATP purpose and need to “ensure the continuing opportunity to travel among the communities of Southeast Alaska to meet basic needs and support the local and regional economy by providing the most financially sustaining transportation system that resources permit” (page 3) cannot be met by building a road from Juneau to Katzechin. As previously discussed, the opportunity to travel between upper Lynn Canal communities will be unpredictable, unreliable, and

unsafe. It will also dramatically increase costs and decrease travel opportunity for walk-ons, including the hundreds of students who travel between Southeast communities for sport and other school activities. The basic need to access Juneau for healthcare and jet travel will become a crap shoot. Constructing a road with insufficient funds to complete the project is the antithesis of financial sustainability. As stated previously, the 2006 Juneau Access EIS analysis showed that existing ferry service was the cheaper and therefore the more financially sustainable option. Also we believe ELC road construction and m&o costs are intentionally low-balled. We will have more to say in this regard in our forthcoming comments on the Juneau Access EIS.

“The purpose and need focus for the draft SATP is on financial sustainability” (page 63). Again, the purpose and need cannot be fulfilled by starting road projects that will not be completed, squandering scarce resources that could be used to replace the aging Alaska Marine Highway fleet with modern, fuel efficient vessels. Instead, DOT should spend our scant transportation resources on improving community-to-community ferry service as repeatedly requested by the large majority of residents who will be adversely impacted by this foolhardy plan.

SATP Mission: The SATP mission of developing “a regional transportation plan that improves mobility for residents, goods, and services throughout the region” (page 4) cannot be met by decreasing mobility in the Upper Lynn Canal. The stated desire of improving connectivity between communities in the region (page 15) also cannot be met by decreasing travel opportunity in the Upper Lynn Canal.

SATP Goals: There is a disconnect between stated goals and the preferred alternative of constructing dead end roads with shorter ferry links. For example, a stated goal is to enhance regional mobility: “Improve transportation opportunities based on demand, reliability, frequency, speed, safety, affordability, environmental responsibility, and the unique character of our communities.” Many have told DOT on numerous occasions that an East Lynn Canal road would neither be safe nor reliable. Some will die driving this road and many more will be injured. The 2006 Golder Geotechnical Report furnishes details regarding safety and reliability in the context of 112 geological hazards identified after the 2006 Juneau Access Record of Decision. An ELC road would remove the option of ferry travel for walk-on passengers, and decrease affordability. It would create environmental damage and also change the “unique” character of Southeast Alaska with a permanent visible scar across the LUD II designated wilderness along the east side of Lynn Canal with negative impacts to wildlife and fisheries.

If the communities of Haines and Skagway believed an ELC road extension would “support economic vitality”, a second goal for the Plan, they would fully embrace it. But community opposition to an ELC road extension is well documented by numerous resolutions from the Haines Borough government and a vote by Skagway residents. Skagway and Haines governments both support commerce and economic growth, and yet neither government believes an ELC extension would achieve the goal of “economic vitality” for our region.

Neither would an ELC road extension improve system efficiency by being “a transportation system that is sustainable for the future”. An ELC road would not offer choices that are “cost effective to the user” or the state. Individuals who cannot travel with a vehicle for one reason or another will be forced to fly – a more expensive option than current ferry fares. Reasons why individuals would travel to Juneau without a vehicle would include any of the following real scenarios: don’t own a vehicle; one car families not traveling together; underage, disabled or senior citizen; vehicle not equipped with safety equipment such as studded tires or 4 wheel drive necessary for harsh winter driving conditions;

leaving for an extended period of time with no place to park a vehicle; etc.

Exchanging a safe ferry service with a partial hard link will neither improve nor maintain modal safety, another expressed goal. The EIS speaks to the number of fatalities and injuries expected from an ELC road extension. Further, a road will tax the ability of law enforcement and emergency medical response entities.

While DOT has provided a “public process” and seeks input from affected communities and the general public, **it has yet to listen to what communities and the general public wants.** The last time the SATP was up for review 90% of comments supported improved community-to-community ferry service, not dead-end roads with shorter ferry links. (2004 SATP, page 112).

Incompatibility with Alaska Statewide Transportation Plan policies

In addition to being incompatible with its own mission statement, goals, and purpose and need statement, the preferred alternative is also incompatible with Alaska Statewide Transportation Plan policies:

Policy 1: Develop the multimodal transportation system to provide safe, cost-effective, and energy-efficient accessibility and mobility for people and freight.

As stated above, an ELC road extension would decrease safety, decrease mobility for the segment of the traveling public that is walk-on, decrease mobility during avalanche season and other year-round slide events, and remove the current service for sending unaccompanied freight containers. We have yet to see the new Juneau Access EIS figures but the 2006 EIS affirmed that existing ferry service was the most economical option for the state. Deploying ACF’s in the upper Lynn Canal instead of building an ELC road would truly be compatible with this policy.

Policy 2: Establish statewide strategic priorities for transportation system development funding.

An ELC road extension is so expensive that other needed projects around the state would not get funded, including replacing our aging ferry fleet. The low expected AADT (380 Increasing to 670 After 30 years) for this route hardly warrants the priority it has been given, particularly in the context of a delayed Seward Highway safety upgrade with an AADT of 15,000.

Policy 3: Apply the best management practices to preserve the existing transportation system.

The existing AMHS needs a sensible rate structure. This important identified need has remained unmet for **fifteen years**. The priority for replacing an aging fleet has been usurped by unrealistic and expensive road segments. ACF’s need to be given the opportunity to prove their viability before the AMHS is effectively dismantled by this plan.

Policy 4: Increase understanding of and communicate ADOT&PF’s responsibilities for system preservation as the owner of highways, airports, harbors, and vessels.

Due to the priority of building the exorbitantly expensive ELC road extension, this Plan allows DOT to continue deferring highway maintenance and deferring replacement of AMHS vessels. DOT cannot communicate its responsibilities for system preservation if it refuses to take them seriously.

Policy 5: Ensure the efficient management and operation of the transportation system. According to the McDowell report prepared for the municipality of Skagway, AMHS fares range from a high of \$2.38 per adult per nautical mile to a low of \$.29. Similarly, the vehicle per nautical mile charges wildly fluctuate between a high of \$3.77 and a low of \$.60. This erratic rate structure is the antithesis

of efficient management. Deploying ACF's in the upper Lynn Canal instead of the proposed road would help ensure efficient operation.

Policy 6: Use technology and Intelligent Transportation Systems where cost-effective to ensure the efficient operation of the transportation system, accessibility, and customer service.

The McDowell Report illustrates that the AMHS cannot be run efficiently until such time as a sensible rate structure is created.

Policy 7: Identify system development needs that address travel demand growth, economic development, and funding strategies through regional and metropolitan plans. Travel demand is correctly characterized as “flat.” As stated previously, if the communities of Haines and Skagway believed an ELC road extension would provide economic development, they would embrace it.

Policy 8: Preserve and operate Alaska's multimodal transportation system to provide efficient reliable access to local, national, and international markets.

An ELC road extension reduces the reliability of travel due to the unpredictability of 36 avalanche chutes and 112 other geological hazards. Efficient, reliable access can be achieved by scrapping the ELC road and operating ACF's instead.

Policy 9: Increase the safety of the transportation system for users of all modes.

A road built underneath 36 avalanche paths and 112 other identified geological hazards will decrease safety. Fatalities and injuries will occur on an ELC road. Conversely, ferry travel is completely safe.

Policy 10: Work with federal, local, and state agencies to provide a secure transportation system and emergency preparedness for all modes.

An unmanned terminal is planned for the Katzehin. Will it provide adequate winter shelter for travelers who have crossed Lynn Canal to Katzehin, only to find that the road has just been closed? Fifty additional, remote miles of road will tax the ability of Haines and Juneau to provide emergency services.

Policy 11: Preserve the integrity of the ecosystems and the natural beauty of the state, limit the negative impacts and enhance the positive attributes – environmental, social, economic, and human health – of an efficient transportation system.

A road corridor across a pristine ELC will create a very visible and unnecessary scar. Truly limiting negative impacts and enhancing positive attributes would mean improving ferry service and no road building through this legislated LUD II wilderness area.

Policy 12: Support energy conservation, specifically in our consumption of fossil fuels, as a matter of national security and to address climate change.

The state is building two new fuel-efficient ferries that will reduce fossil fuel consumption dramatically when deployed to connect the communities of Haines, Skagway and Juneau. Conversely, an ELC road extension is anticipated to increase traffic in the corridor by tenfold, and thus increase fossil fuel consumption. (SATP page 10).

Policy 13: Develop transportation plans in close coordination with local communities to ensure transportation investment decisions reflect Alaskans' quality of life values.

Public comment overwhelmingly supports community-to-community ferry service and overwhelmingly opposes building dead end roads. DOT has yet to come before the Haines Borough Planning Commission. DOT's insistence on building dead-end roads does not reflect our wishes or our

values.

Policy 14: *The statewide plan will provide the analytical framework from which ADOT&PF sets investment priorities.*

Federal funding to Alaska for transportation infrastructure is declining, as are state revenues. If an ELC road is begun, it will likely never be completed due to cost overruns and a lack of funding. DOT's ELC investment priority goes against state policy and is counter to the mission and goals of the SATP. The ELC road extension should be scrapped once and for all.

Conclusion

The Alaska Marine Highway is safe, dependable, environmentally friendly transportation; with a 99% passenger approval rating, according to a 2000 McDowell study. An ELC road would be dangerous, unreliable, and environmentally damaging. A majority of residents in all three Lynn Canal communities support improving ferry service over a road. Deploying ACF's will improve ferry service and decrease maintenance and operations costs. In considering factors of financial feasibility, community support, potential risks, environmental implications and community economics, community-to-community ferry service is a far better choice than dead-end roads with short ferry segments. Listen to the wishes of the people and fund the AMHS instead.

Thank you for the opportunity to comment, and for taking public comment seriously.

Sincerely,

Eric Holle
President Lynn Canal Conservation

Sept 21, 2014

Dear ADOT & PF Southeast Region Planning

I want to comment on the Kate to Petersburg Road.

I know that the road and the electric line from Petersburg to Kate are not directly the same project, but I feel that the electric line will not get built without the road being built first.

I feel that the electric line is not needed. There is plenty of opportunity to get tide generated electric power in the Kate area without a road or power line along with the road. There are tide or current generators around the world that work just fine. It appears to me that generating power at Kate would be much more economical, plus it might create a job or two.

I also believe that the Kate people would choose to go to Juneau instead of Petersburg. Why do so many Petersburg ~~pe~~ people go to Juneau to shop and see a doctor if Petersburg is such a good place to do these things?

Twenty or so years ago Kate people came to Petersburg for shopping and doctors. Once they found out about Juneau, Kate people mostly quit coming to Petersburg.

Otis Marsh
P.O. Box 606
907 772 3208

Petersburg AK 99833

King's Store

PO Box 610
Haines Alaska 99827
Fax 907-766-2614



FAX COVER LETTER

DATE 9/30/2014
TIME 10:45

Please deliver immediately to:

NAME Andy Hughes, S.E. Planning chief
COMPANY DOT & PF - Alaska
FAX # (907) 465-2016

FROM:

NAME Bill McCord
COMPANY Haines citizen

SATP 2014 COMMENTS

Handwritten lines for notes or comments.

30 September 2014

TO: DOT & PF, State of Alaska, Juneau, AK

FROM: Bill McCord, Haines, AK

SATP 2014 COMMENTS:

1. Pages vii & 76 require reconciliation: the former states the SATP is "a guide...not to meet administrative requirements," and the latter contradicts that by listing administrative rules/advisories being met, i.e. "...plan is made in accordance with:..." Additionally, the Plan cites specific administrative code requirements (p.i &p.5) that directly contradict the page vii statement as well as public presentations. Misleading the public undermines confidence and participation in public planning. These are direct violations of 23 CFR 450.210, where "at a minimum" the State must "ensure that the process provides full and open access..."
2. The plan omits references to O&D data for the ferry system and where it can be found. Further, the data externally located [via the AMHS website] are both poorly tabulated and barely comprehensible for reasonably sophisticated public use. The Plan also fails to instruct the public on how to access said data.
3. Intermodal strategies, especially schedule synchronization for existing transportation, are completely missing; pp. 24-25 amount to pathetic narratives about loosely connected transportation resources. Anecdotal and documented records show this pernicious indifference has been chronic for more than a few years.
4. The plan needs to include a prioritized matrix illustrating how the S.E. Alaska population decrease [explicitly noted in the plan narrative] will alter the demand for road and ferry services. While the plan recognizes the probable decrease, it must indicate where and how much.
5. To provide a rational basis for public response and legislative initiatives, a tabulation of revenue and corresponding costs for existing and proposed ferries will enhance the SATP as a development guide.
6. Unless specific facts/data can be provided/cited, the SATP must omit the purely speculative p.28 statement, "...addition of two Alaska Class ferries...Lynn Canal may see an increase in traffic." In fact, if the Plan's assertions about population carry any substance, the p.28 statement amounts to nothing more than fantasy.
7. As there are no factual/financial elements presented in the Plan to justify interrupting the Bellingham-Skagway ferry route, the proposed disembarkation at Juneau must be more responsibly examined. Issues demanding attention: impact on commercial and non-commercial users' choices, the incentive for drivers from the lower 48 to shift to interior instead of coastal routes, the consequences for the traditional Haines & Skagway communities, and the proportional revenue role of the mainline service ferries.
8. Despite repeated reminders about slow-to-no growth in population, state funding, air & ferry traffic, and mining--pp.27-28, the Plan imprudently endorses "34 essential transportation and utility corridors...and individual components of each" (pp.31-33). At a minimum, the Plan must include a continuum of prioritized projects. And, in keeping with the DOT stated commitment to multimodal transportation, each project narrative must explain how each mode is accommodated.

THE SATP 2014 IS NOT A PLAN. IT'S A BUREAUCRATICALLY MANDATED POSTURE JUSTIFYING FUNDING. CONSEQUENTLY ANY PERCEPTIVE VIEWER WILL SEE THIS PLAN FOR HOW IT MANIFESTS, A HALF-BAKED, CHAOTIC HODGE-PODGE OF DISJOINTED FACTS AND POORLY DELINEATED PLANNING.

DATE: September 29, 2014
TO: ADPT&PF Southeast Region
ATTN: Andy Hughes
RE: SATP PLAN 2014 DRAFT

First of all, thanks to you and your staff for the SATP Draft plan and traveling to our villages for public meetings. We know that getting to our rural communities can indeed be challenging at times.

The exact intend of the SATP is to address the transportation needs of people, goods, and equipment to/from our (rural) communities; of which is directly tied to our overall economic picture and as such is a vital infrastructure need.

We are very excited that the Angoon Airport is a planned project in the 2014 SATP. The Angoon voters voiced their wishes in the municipal election back in 1998, so the anticipation level is increasing.

At the same time, we are acutely aware of the continued need for ferry service. In years past, we transported the remains of our family and friends by scine boats. Like many other SE communities, we had great number of local boats. Four years ago, Angoon sadly watched as our last boat left for another permanent port. And over the years, the ferry crew has grown to know local families from the grandmothers to their grandchildren.

As we ceremonially greet our deceased remains, their quiet presence at terminal is reminiscent of the military display of honor and very much appreciated by the family and public.

As continued ferry service is an evident need, the request was made at two SATP meetings to include Angoon:

- on existing system, page 15 and
- on the mapped SE ferry routes pages 16-17

It is important to make correction on page 24- "Angoon does not have seasonal barge service." Angoon Trading, our only store, has to charter an AML barge to bring in propane as approximately 90-95% household's cook and heat water with propane. The store also transports vans of groceries on the weekly ferry runs to/from Juneau.

This is imperative information when considering the current level of isolation aspects of our community transportation (needs).

Please accept our attached listing indicating that we (all) read and agree with this letter of comments.

Page 1

SIGNED NAME	ADDRESS
John McQuinn	P.O. Box 93 Angoon AK 99820
Quail J. Jones	P.O. Box 103 Angoon AK 99820
Christina Jones	P.O. Box 213 Angoon AK 99820
Mike Jost	P.O. Box 58 Angoon AK 99820
Lillian Jamestown	Box 213 Angoon AK 99820
Bertha Jane Demmitt	Box 44 Angoon AK 99820
Harold James	Box 22 Angoon AK 99820
Ray A. Nelson, Jr.	Box 52 Angoon AK 99820
Willie Jane	Box 215 Angoon AK 99820
Walter Deak	P.O. Box 45 Angoon AK 99820
Dolan G. Price	P.O. Box 40 Angoon AK 99820
Barbara George	Box 40 Angoon AK 99820
Martha Luoma	P.O. Box 174 Angoon AK 99820
Carolyn Ager	P.O. Box 108 Angoon AK 99820
John L. J.	P.O. Box 25 Angoon AK 99820
Annie K. Bruley	P.O. Box 172 Angoon Alaska 99820
Robert Paul	P.O. Box 302 Angoon AK 99820
Wally R. French	P.O. Box 112 Angoon AK 99820
Delores Jamestown	P.O. Box 147 Angoon AK 99820
Leon J.	P.O. Box 78 Angoon AK 99820
Michael J. Linn	P.O. Box 227 Angoon AK 99820
Quanita Silva	P.O. Box 117 Angoon AK 99820
Marlene J. Zubill	P.O. Box 84 Angoon AK 99820
Alan J. J. W.	P.O. Box 84 Angoon AK 99820
Sheila Mitchell	P.O. Box 84 Angoon AK 99820
John J.	P.O. Box 84 Angoon AK 99820
Kevin Mitchell	P.O. Box 84 Angoon AK 99820
Shirley	P.O. Box 203 Angoon AK 99820
Rosanna Williams	Box 203 Angoon AK 99820
Joseph Jim	P.O. Box 82 Angoon AK 99820
Evangelos Howard	Box 136 Angoon AK 99820
Michael Howard	136 Angoon Alaska 99820
Mike C. Gower	Box 395 Angoon AK 99820
Francis A. Johnson	P.O. Box 11 Angoon AK 99820
Evelynna Strom	P.O. Box 93 Angoon AK 99820

ADOT & PF
Southeast Regional Planning
PO Box 112506
Juneau, Alaska 99811-2506

Dear Sir or Madam,

I am writing in support of the proposed Kake to Petersburg road that will allow increased access for the community of Kake and an eventual desperately needed power intertie. I write to you from Petersburg but I have extensive involvement and experience with the challenges faced daily by the residents of Kake. The community of Kake needs access and with it the opportunity for cheaper power, more jobs, improved freight movement and better markets for the area's abundant natural resources.

I have lived and taught school in Kake for 2 years, been a partner in a business there for 28 years, managed the purchase of cost recovery fish from the now closed hatchery for over 10 years, oversaw management of the local seafood plant for 1 year and spent a great deal of recreational time in the area. During these experiences I have seen the potential that the community has, but also seen it stifled by the isolation and high cost of living. When I lived in Kake it was a vibrant community of 750+ people, with an economy that provided its citizens a chance to live and prosper. With the steadily increasing price of oil, the energy costs get prohibitive for business, and the community began its decline. Certainly there were many other factors like the end of the logging boom, but no community or business can flourish with \$.60+ per kwt power. Kake needs a lifeline and this road and power line are the help that it needs. With access and energy Kake will be able to start to rebuild based on entrepreneurial talent, abundant natural resources and the strong culture of the community and area.

In my letter I want to stay totally positive about this project and not try to attack the claims of the people who are in opposition to this road. I will say that as Petersburg resident that I will not be offended or hurt in anyway by the view of a valuable road on Kupreanof Island. My recreational experiences on Kupreanof will be enhanced and not diminished by this road. When I think any negative thoughts of this Kake-Petersburg road it is completely overwhelmed by the great benefit that this road will bring to my friends in Kake. I hope that the plans and development of the Kake to Petersburg road will move forward as quickly as possible.

Thank you for the opportunity to comment on this project.

Sincerely,



Dave Ohmer
613 Sandy Beach Road
Petersburg, Alaska 99833

Organized Village of Kake

P.O. Box 316

Kake, Alaska 99830-0316

Telephone 907-785-6471

Fax 907-785-4902 / email KeexKwaan@KakeFirstNation.org

(Federally Recognized Tribal Government serving the Kake, Alaska area)

April 25, 2013

Michael Traffalis
FHWA Engineer

Questions that you asked about in your email on April 24th about the Kake Access Road, that you wanted clarification on, my answers & comments are in **Red**.

Hey, in reviewing all the background documentation I was wonder if OVK could provide me with why the community shifted on its position.

- In 2004 the State published a plan to connect Kake with a road. That idea was not well received with the City/community documenting at that time they wanted more ferry trips and not a road. **The price of fuel was not so much back then, thus, the cost of electrical power and the cost to fly out of Kake was not so high, some jobs were still here in town, and more ferry trips were worth while to get health patients to the Southeast Alaska Regional Health Continuum (SEARHC) and to and from Juneau to visit Government Agencies, Costco & other stores.**
- Then in 2008 the City passed a resolution in support of the inter-tie and a road for access.

What happen between 2004 and 2008 that caused the City/community to shift its opinion? **The City & the community began to feel the cost of fuel and the national recession impact on the social & economic community has been devastating to rural community of Kake.**

The Organized Village of Kake began the Community Economic Development Strategy (CEDS) Plan, in 2004, with the City of Kake, Kake Tribal Corporation, School District, Hatchery and other entities that were interested in planning a sustainable Kake during the economic down turn nationally, regionally, state wide and locally. The CEDS Plan listed the Hydroelectric Intertie, from Petersburg, as a priority for cheaper and more sustainable power source; the transportation in and out of Kake is listed as another priority-the now built Kake Intermodal Transit Facility that OVK built and the Access Road to Petersburg-that was pushed by the State of Alaska DOT/PF Planners and the City of Kake is another priority.

I have seen documents that showed population decline in Kake about this same time, so where people moving away due to the high cost of living and lack or economic opportunity? **The Kake Tribal Cold Storage fish plant closed down during this time, because of the high cost of electrical power. Kake Tribal Corporation Logging and Construction along with Sealaska Corporation Logging closed down. The Small Forest Service Logging contracts closed too. With the closed seasonal jobs that were lost due to the timber being logged off and the high cost of living in Kake, the people that were looking for jobs left town to work in Juneau, Sitka, Anchorage and Seattle.**

2nd question: you mentioned during our meeting with OVK and during our scoping meeting with the community that increased access for **subsistence, not “substance”**, areas is a need. Can you elaborate on why this is a need of the community? The state appropriation stated this as well, I just want to make sure I understand this better. **Subsistence, our phrase for this is Customary & Traditional Gathering, on any of the alternative that you have selected you will find that our ancestors gathered their fish, game and plants all over this island. The fact that a new road route would be built, this would open up those old areas that we used to gather and we will access new areas to collect subsistence like hunting, fishing, fire wood, berries, plants, shell fish and recreation areas. With today’s high cost of energy and food, the majority of Kake residence depend on Subsistence Gathering more today than back in 2004 and the amount of Subsistence we Gather is about 55% of our Daily Diet!!**

3rd- The state appropriation also states there is a need for increase access to medical facilities in Petersburg. Can you explain what is currently not working with your clinic and access to Sitka? Again just trying to get all my facts straight before we go out to the public. **The fact that fuel is the measure of cost of getting medical help here in Kake is key. Most of the time the cheaper way to get to the SEARHC Hospital in Sitka is by the Alaska State Ferry that we have once (1) per week, and every other week, the ferry skips Sitka on its way up to Juneau and the way back from Juneau to Kake, the medical attention that is needed does not warrant a Medical Emergency Flight from Sitka to Kake, so...currently the people in need to see a advanced Medical staff have to SUFFER AND WAIT to get help, NOW IF we have a road that would be able to access the Petersburg Hospital or a Dentist, the current suffering by our Elders and Youth could be alleviated by a decent road from Kake to Petersburg.**

Thanks for all your support

Mike

These are my answers and comments, I will cc other OVK staff and Councilpersons, and they can weigh in on your questions themselves. If you have any comments & questions please call me, @ 907-723-4324, or email me back.

Thanks,

Mike A. Jackson
Transportation Director
Organized Village of Kake



September 12, 2014

Andy Hughes
Regional Planning Chief
Southeast Region, ADOT&PF
6860 Glacier Highway
Juneau, AK 99801-7999

ADOT&PF – Southeast Region Planning
PO Box 112506
Juneau, AK 99811-2506

dot.satp@alaska.gov

Dear Mr. Hughes,

We are writing to comment on the Department of Transportation's Southeast Alaska Transportation Plan, June 2014 Draft.

As DOT is aware, residents of Petersburg rely on air and water-based travel for commerce, business travel, access to medical services, travel for school academic and sports activities and for recreation. As such, safe, reliable, affordable, and consistent transportation options are critical to the long-term viability of our community.

The plan's Executive Summary states "...the majority of the plan includes actions to maintain and improve the service provided today...". This statement is misleading; service is neither being improved nor maintained for all communities. The statement should either be deleted or amended to clearly indicate the majority of the plan includes actions to improve service to some communities, primarily those in northern Southeast Alaska, and reduce or eliminate service to other communities such as Petersburg and Wrangell.

Loss of Mainline Vessels - The draft plan makes much about the fact that it maintains existing AMHS routes, but drawing lines on a map is very different from maintaining an adequate level of service along these routes.

For the last 10 years, DOT has been reallocating ferry service away from central Southeast Alaska to other communities; this has had a pronounced negative effect on use and ridership of the ferries in our area. Our community has seen an overall decrease in port departures by 19.5% even with all mainliners operating and nearly an equal amount of decrease in ridership. The draft plan now makes these scheduling and service decisions permanent by proposing to retire three mainliners and replacing only one.

Communities relying on mainline service, i.e. Petersburg and Wrangell, will receive even less frequency of service. The residents of central Southeast Alaska should not be penalized for the poor planning and scheduling decisions by the DOT that have led to reduced ridership in our area. Moreover, these service reductions do not meet the Plan's stated mission and goal of improving mobility for residents, goods and services throughout the region, and we are opposed to them.

The proposed plan implies a second mainliner could be added if "ridership numbers warranted". It is hard to imagine ridership increasing when the frequency of service is reduced. We request DOT provide an example of ridership increasing when frequency of service is reduced.

At a recent public meeting in Petersburg, DOT representatives stated there is "latent demand" for ferry service in other parts of the region and they are attempting to serve this demand by allocating resources to these areas. But despite allocating more and more service to these areas over the last decade, overall

ridership on the marine highway system has not increased. When asked why this is, DOT representatives point to AMHS's "problem of scheduling". It appears when the numbers do not support DOT's decision, they simply place the blame elsewhere.

DOT representatives further stated the proposed 98 summer/70 winter sailings per week in Lynn Canal will benefit residents of central southeast because we will have better access to the continental road system out of Haines/Skagway. Unfortunately, it doesn't really matter how many vessels DOT operates in Lynn Canal, Petersburg residents can only access these routes when the mainline ferry stops in Petersburg en route to Juneau, which will be 5 times a week in summer and 3 times per week in winter. Moreover, we would have better access to the continental road and rail system through Prince Rupert, BC if the DOT would provide adequate ferry service to that port. Eight daily sailings in Lynn Canal do not improve transportation opportunities for residents or commerce in Petersburg.

For these reasons, we advocate purchase of a second mainline ferry be included in the preferred alternative.

Road System - DOT's projections for a multi-modal system suggest that there will be increased reliance on new, expensive, low-volume roads. Some of these proposed roads might not be able to provide safe, reliable, cost-effective and convenient year-round access for users, despite DOT's optimistic projections. There was much concern expressed at the open house/public meeting in Petersburg about the proposed Kake to Petersburg road. As outlined in the draft plan, the proposed road would be a single lane gravel road with pull-outs along the northern shore of Kupreanof Island. This road would present only another seasonal option, as it is outside the realm of reality that a road between Kake and Petersburg would be adequately maintained for safe and uninterrupted travel during the winter.

Members of the public were very concerned about DOT's ability to provide resources necessary to adequately maintain the road, especially during the winter; the additional cost to the Petersburg Borough of providing public safety/EMS services to travelers on the road; the possible location of one of the ferry terminals at the existing government dock; and the City of Kupreanof's rights as a roadless community. There is also significant concern that ultimately DOT will eliminate the ferry terminal in Petersburg and force passengers to travel to Kake to access AMHS northern routes. For the record, we strongly oppose this course of action.

Lastly, DOT is well aware the federal Essential Air Subsidy is under attack in Congress and could be eliminated over the next twenty years. This plan should consider the effects to residents of smaller communities served by Alaska Airlines if the subsidy is eliminated. The cost of travel for residents and the effect on business, government agencies, seafood processors, tourism, school travel could be quite significant and DOT should be analyzing and planning for that likely eventuality now.

The goals of the SATP include providing support for economic vitality, increased modal safety, cost effectiveness for the user, and recognition of our unique character as communities. DOT's emphasis on new roads and the shifting of resources to the most populous urban region of the state falls far short of the intent of these goals.

Respectfully,



Mark Jensen
Mayor



September 12, 2014

Andy Hughes
Regional Planning Chief
Southeast Region, ADOT&PF
6860 Glacier Highway
Juneau, AK 99801-7999

ADOT&PF – Southeast Region Planning
PO Box 112506
Juneau, AK 99811-2506

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Respectfully,



Mark Jensen
Mayor



September 15, 2014

Andy Hughes
Regional Planning Chief
Southeast Region, ADOT&PF
6860 Glacier Highway
Juneau, AK 99801-7999

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PO Box 750, Petersburg, Alaska 99833
Phone (907) 772-4042 - Email petersburgedc@gmail.com
www.petersburgedc.org

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Members of the public were very concerned about DOT's ability to provide resources necessary to adequately maintain the road, especially during the winter; the additional cost to the Petersburg Borough of providing public safety/EMS services to travelers on the road; the possible location of one of the ferry terminals at the existing government dock; and the City of Kupreanof's rights as a roadless community. There is also significant concern that ultimately DOT will eliminate the ferry terminal in Petersburg and force passengers to travel to Kake to access AMHS northern routes. For the record, we strongly oppose this course of action.

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Respectfully,



Liz Cabrera
Coordinator
Petersburg Economic Development Council

ALASKA DEPT. OF TRANSPORTATION
SOUTHEAST REGION PLANNING
P.O. BOX 112506
JUNEAU, ALASKA 99811-2506

OR

MIKE TRAFFALIS, PROJECT MANAGER
FEDERAL HIGHWAY ADMINISTRATION
WESTERN FEDERAL LANDS HIGHWAY DIVISION
610 EAST FIFTH STREET
VANCOUVER, WASHINGTON 98661-3801

9-28-14

KAKE ACCESS PROJECT

THE 2004 SOUTHEAST ALASKA TRANSPORTATION PLAN, PAGE 3 OF 4 STATES THAT "THE LOCAL COMMUNITY IN KAKE DID NOT EXPRESS SUPPORT FOR A ROAD, FAVORING IMPROVED FERRY SERVICE INSTEAD". ① THE 2011 SOUTHEAST ALASKA TRANSPORTATION PLAN UPDATE SCOPING REPORT MAKES NO MENTION OF COMMUNITY OF KAKE SUPPORT FOR A ROAD SYSTEM. PLEASE EXPLAIN.

I HAVE NOT HEARD OR SEEN ANY EXPLANATION OF COSTS OF CONSTRUCTION, POSSIBLE TOLL CHARGES, HOURS OF OPERATIONS, SEASONAL OPERATIONS, STATE OR PRIVATE OWNERSHIP OF SHUTTLE FERRIES, OR MAINTAINENCE OF ROADS OR FERRIES IN YOUR TRANSPORTATION PLAN. PLEASE PROVIDE THESE IMPORTANT ASPECTS OF YOUR PLAN.

PETERSBURG WAS IN A SIMILAR DELIMINA YEARS AGO WHEN WE WERE SERVICED BY FREIGHT ONCE A WEEK IN SUMMER AND TWICE MONTHLY IN THE WINTER — THAT INVOLVED INTO BARGE SERVICE FOR GOODS INTO PETERSBURG. AFTER THAT WE WERE PROVIDED WITH TWICE WEEKLY FERRY SERVICE NORTH OR SOUTH — NO ROADS. THEN CAME AN EXPANSION OF MEDICAL FACILITIES

① KAKE ACCESS EIS JUNE 2013

(A.172)

(2)

AT THE EXPENSE OF THE COMMUNITY OF PETERSBURG. AN AIRPORT WAS ADDED FOR OUR NEEDS AND EXPANDED LATER TO ACCOMMODATE JET SERVICE — STILL NO ROADS. PETERSBURG HAS SURVIVED AND FLOURISHED SINCE 1904 WITHOUT A ROAD TO THE OUTSIDE WORLD — WHY CANNOT KAKE ADOPT THE SAME STRUCTURE?

I AM NOT GOING TO HOP A SHUTTLE FERRY IN PETERSBURG, CROSS WRASEL NARROWS TO KUPREANOF, DRIVE 12-15 MILES, HOP ANOTHER FERRY IN DUNCAN CANAL (WITH VERY MARGINAL WINTER WEATHER CONDITIONS — WHICH THERE IS NO MENTION OF), DRIVE ANOTHER 34-38 MILES TO KAKE, HOP ANOTHER FERRY BOUND FOR JUNEAU FOR ANY MEDICAL TREATMENT WHEN IT WOULD BE CHEAPER AND FASTER TO HOP A JET FOR THAT PARTICULAR TRIP. WHAT IS THE COST AND RELIABILITY OF DRIVING OR FLYING FOR EMERGENCY MEDICAL. MOST PEOPLE WITH EMERGENCY MEDICAL ARE ~~BE~~ AIR-LIFTED BY JET OR COAST GUARD.

THE JUNE 2013 KAKE ACCESS EIS ALSO STATES ON PAGE 1 OF 4 THAT THERE IS "LIMITED ACCESS TO SUBSISTENCE RESOURCES." THE TOWN OF KAKE HARVESTED SUBSISTENCE RESOURCES PRIOR TO ANY ROADED SYSTEMS FOR CENTERIES, AND FOR A LARGER POPULATION BASE. WHERE AND TO WHOM DID THE RESOURCE EXTRACTIONS OF THE PAST 30 YEARS BENEFIT? WHY PROVIDE MORE ROADS IF YOU CANNOT PROTECT SUBSISTENCE RESOURCES.

(NEXT)

THE ORIGINAL EA FOR HIGHWAY 40 (WHICH SEEMS TO BE DESIRED BY SOME) PRESENTED THE FOLLOWING POTENTIAL PROBLEMS:

- (1) ELEVATION AND DISTANCE FROM SALT WATER IN SEVERAL LOCATIONS WHICH AFFECTS THE MAINTAINENCE LOGISTICS.
- (2) FERRY TRANSPORTATION ACROSS WRANGELL NARROWS.
- (3) POSSIBILITY OF A BRIDGE ACROSS SALT CHUCK.
- (4) REPOSITIONING ROAD CENTERLINE THRU DUNCAN PASS ON THE NORTH SLOPE (1960 B. P. R. SURVEY).
- (5) SEDIMENTATION FROM GRAVEL ROADS INTO IMPORTANT FEEDER STREAMS.
- (6) REDUCTION OF WILDERNESS ASPECTS OF INVOLVED AREA BECAUSE OF INCREASED ACTIVITY AND ROAD CONSTRUCTION.
- (7) INCREASED HUNTING AND TRAPPING ACTIVITIES AS WELL AS SPORTFISHING.
- (8) INCREASE TIMBER HARVEST AND INCREASED LAND MANAGEMENT PROBLEMS.
- (9) INCREASED REDUCTION OF WILDLIFE HABITAT.
- (10) INCREASED REDUCTION RESOURCE UTILIZATION DUE TO PUBLIC DEMANDS ON PUBLIC LANDS.

THE ORIGINAL EA FOR HIGHWAY 40 ALSO CLAIMED THAT STATEMENTS OF OPPOSITION FOR THIS PROJECT HAVE NOT OCCURED. CONTRARY TO THIS STATEMENT (AS EXPRESSED PRIOR TO A STATE OF ALASKA "ONE-VOICE POLICY" AS TENDERED BY THE PARNEEL ADMINISTRATION) ARE LETTERS OF INTREST SUCH AS:

- (1). A SEPTEMBER 4, 1969 LETTER FROM

A.D.F.G., WALLACE H. NOERENBERG TO U.S.F.S, SUPERVISOR VINCENT OLSEN IN WHICH HE STATES THAT "IT HAS BEEN THE UNFORTUNATE EXPERIENCE OF SOME LAND MANAGERS AND RESOURCE MANAGERS THAT INCREASED ACCESS HAS DETRACTED FROM AN AREA AND IN FACT, HAS CAUSED A DETERIORATION OF AREA VALUES AND THEREBY DEFEATED ITS PURPOSE. IN THIS CASE, INCREASED ACCESS COULD CONCEIVABLY CAUSE TOO MUCH PRESSURE ON THE FISH AND WILDLIFE RESOURCES AND PERHAPS DECREASE THEIR NUMBERS TO A POINT THAT REGULATORY RESTRICTIONS MIGHT BE NECESSARY." THIS HAS ALREADY HAPPENED ON KUPREANOF ISLAND BECAUSE OF EXTENSIVE TIMBER HARVESTING AND AN ADDITIONAL ROAD SYSTEM PLUS PROPOSED TIMBER HARVESTING WILL ONLY EXACERBATE THE PROBLEM.

(2) A NOVEMBER 13, 1972 LETTER FROM A.D.F.G. BIOLOGIST HARDY MERRIAM TO ADFG DEPUTY COMMISSIONER JOE BLUM STATES "UPPER DUNCAN CANYON IS ONE OF THE BEST RECREATIONAL AREAS IN ALASKA. IT IS ONE OF THE FEW AREAS IN SOUTHEAST WHICH WE RECOMMENDED FOR INCLUSION AS CRITICAL HABITAT AND WE SHOULD BE VERY CAUTIOUS IN HOW IT IS DEVELOPED."

(3) A JANUARY 4, 1973 LETTER FROM A.D.F.G. COMMISSIONER JAMES W. BROOKS TO ALASKA DEPT. OF HIGHWAYS PROJECT ENGINEER SCHUYLER J. STEVENS IN WHICH HE STATES "THERE IS EVERY REASON TO BELIEVE THAT ONE OF THE JUSTIFICATIONS FOR BUILDING

THE ROAD IS ACCESS FOR TIMBER HARVESTING AND OTHER TYPES OF RESOURCE UTILIZATION AND DEVELOPMENT. THIS WILL MEAN CONSTRUCTION OF STILL MORE ROADS OFF THE MAIN FOREST HIGHWAY. WITHOUT SOME IDEA OF FUTURE USE PATTERNS ANY RECOMMENDATIONS AS TO WHICH COURSE OF ACTIONS SHOULD BE TAKEN MAY BE MORE OR LESS MEANINGLESS." ALSO: "THE DRAFT ENVIRONMENTAL STATEMENT SHOULD EXAMINE SUCH FACTORS AS THE CROSSING OF WRANGELL Narrows, Ferry facilities for KAKE, WINTER ROAD MAINTAINENCE AND THE OVERALL COST PER UNIT OF SERVICE RENDERED AS CONTRASTED WITH THE VERY IMPORTANT FISH, GAME, AND RECREATIONAL RESOURCES PRESENT."

A PERSONAL CONCERN OF MINE IS THE PROXIMITY OF A ROAD ALIGNED WITH A UTILITY CORRIDOR PAST INDIAN POINT TO KAKE IN WHICH IT ABUTS ONE OGR AND DIRECTS ANOTHER; THIS IS NOT RESPONSIBLE PROTECTION OF WILDLIFE HABITAT.

ANOTHER CONCERN I HAVE IS THAT THE STATE HAS USED AN AGENCY AS A CLEARING-HOUSE FOR COMMENTS FROM OTHER STATE AGENCIES AND THEREFORE NOT ALL INFORMATION IS BROUGHT FORTH TO MAKE A PROPER DECISION. DO YOU INTEND TO UTILIZE ALL AVAILABLE INFORMATION FROM ALL STATE AGENCIES OR AN ALL-ENCOMPASSING "ONE-VOICE" COMMENT FROM THE STATE?

AN ADDITIONAL CONCERN IS THAT OTHER THAN CENTRAL PRINCE OF WALES ISLAND,

⑥

KUPREANOF AND MITKOE ARE THE HIGHEST AREAS OF RESOURCE EXTRACTION IN THE TONGASS NATIONAL FOREST. IN 1974 THE U.S. F.S. ATTEMPTED TO MAINTAIN A HIGH PRIORITY FOR THE PROGRESSIVE DEVELOPMENT OF FOREST HIGHWAY 40; THIS WILL ONLY ADD TO THE ALREADY DEMINISHED WILDLIFE HABITAT.

I DO BELIEVE THAT EXISTING FERRY SERVICE FAR OUT-WEIGHTS THE SERVICES WHICH WOULD BE PROVIDED BY A ROAD.

AN APRIL 23, 1982 LETTER TO ENVIOSPHERE CO. FROM A.D.F.G. AREA HABITAT BIOLOGIST, DON KELLY STATED THAT "A.D.F.G. RECENTLY COMPLETED WORK ON A RATING SYSTEM (FOR U.S. F.S. -VCU'S) CALLED FOREST HABITAT INTEGRITY PLAN (FHIP). THIS PLAN, WHICH INCLUDED INPUT FROM OUR GAME, SPORT FISH, AND COMMERCIAL FISHERIES DIVISIONS, RATED EACH VCU ON THE FOREST BASED IT VALUE TO FISH AND WILDLIFE." I SUGGEST YOUR AGENCY REVIEW THIS PLAN BEFORE PLANNING A ROAD SYSTEM AND ITS IMPACTS.

A.D.F.G. HAS SINCE 1975 CONSISTANTLY REPUTED CLAIMS THAT INCREASED ACCESS WILL BENEFIT THE RECREATIONAL USER; HISTORICALLY, INCREASED ACCESS AND PRESSURE HAS RESULTED IN LOWER QUALITY RECREATIONAL EXPERIENCES AND A REDUCED QUANTITY OF GAME AVAILABLE.

THE U.S. F.S. HAS INADEQUATELY PROVIDED A RESOURCE (SITKA BLACK-TAILED DEER) AN ENVIRONMENT IN WHICH TO ADEQUATELY SURVIVE AND SUPPORT SUBSISTENCE AS MANY OGR'S ARE

IN LOW VOLUME CLASS 3 OR "NONFOREST" HABITAT, AERIAL PHOTO'S DISTINCTLY SHOW O&R'S WITH MAJORITY AREAS OF MUSKEG AND/OR PREVIOUSLY LOGGED UNITS ALONG BEACH FRINGES WHICH ARE NOT BENEFICIAL TO DEER WINTER SURVIVAL.

AN IMPORTANT RESOURCE (WILDLIFE) IS BEING SACRIFICED FOR ANOTHER (TIMBER) WITH AN ADDITION OF THIS PROTECTED ROAD SYSTEM.

I CLEARLY RECOMMEND NO ROAD SYSTEM.

SEEING AS I'M OUT OF TOWN AND MOOSE HUNTING FOR A MONTH I'M SENDING THIS LETTER TO TOWN WITH A FRIEND TO MAIL OUT. PLEASE PROVIDE MIKE TRAFFALLIS, PROJECT MANAGER AND MYSELF WITH A COPY OF THIS LETTER IF YOU WOULD PLEASE. GREATLY APPRECIATED.

DAVID B. RANDROP

David B Randrop

P.O. Box 44

PETERSBURG, ALASKA
99833

(907) 772-3301



Representative Sam Kito III

Alaska State Legislature

September 29, 2014

via email: dot.satp@alaska.gov

Andy Hughes
Regional Planning Chief
ADOT&PF
Southeast Regional Planning
PO Box 112506
Juneau, AK 99811-2506

Dear Andy:

I appreciate your efforts in managing the development of the draft long-range transportation plan for Southeast Alaska. This is an important document for the future of transportation in our region. Adaptation to changing conditions is important for the Department to consider, especially in these times of declining state revenues, and pressure on the state operating budget.

With those initial considerations in mind, I have provided the following comments on the plan.

1. It is important to provide a clear description of the process for reviewing the SATP alternatives, and the rationale and methodology for selecting the preferred alternative. Especially helpful, would be an identification of the criteria used by DOT&PF in the selection process, and how the criteria were prioritized.
2. Maintenance of our existing infrastructure should be a priority – Southeast Alaska has a well-integrated transportation system that has known operational and expected capital costs. Management of, and improvements to, the existing transportation system needs to be the primary focus of the SATP, especially given budget pressure on capital and operations.
3. The preferred alternative is only estimated to result in an annual overall FY2033 system savings of approximately \$2 Million over maintenance of the Baseline System. The Max. Use of Existing Roads alternative results in an annual estimated overall FY2033 system savings of \$27.5 Million over maintaining the Baseline System. More effort should be made to increase cost savings of the Southeast surface transportation system given concerns about decreasing state revenue and possible decreases in Federal Highway and other federal funding.
4. The preferred alternative shows an overall annual capital cost increase of \$740,517 whereas the Max. Use of Existing Roads alternative shows an annual decrease in capital cost requirements of approximately \$6.2 Million. More consideration should be given to decreasing capital fund requirements over the next 20 years. This is especially important given the potential loss of Federal Highway and other federal funds.
5. It is noticeable in the draft SATP that the Max. Use of Existing Roads alternative results in a very significant savings to the ferry system operational costs. Annual ferry system operation savings for the Max Use of Existing Roads alternative is \$20.3 Million over the Baseline

alternative, while the preferred alternative only results in a savings of \$6 Million over the baseline.

6. Consideration should be given to removing the Juneau Access component of the plan, as the project does not appear to result in a significant cost savings for the system, and the service level increase does not appear to be supported by the documentation. The plan provides a projected increase in system capacity for northern Lynn Canal that is not supported by traffic projections or studies that indicate there is a demand for additional capacity. The Juneau Access Project, however, will result in additional maintenance costs to the state, and will also result in emergency services costs to the Juneau Borough and Haines Borough because the road will pass through both boroughs, and the state will probably not be providing emergency services.
7. Consideration of non-vehicle traveling public needs to be discussed in the SATP. How are independent travelers going to be accommodated for travel to and from remote terminals without vehicles. This discussion needs to cover individual travelers, those traveling with kayaks, or bicycles, or students traveling with school teams.
8. The Kake to Petersburg transmission line provides an opportunity to link Kake to the Tyee-Swan Lake hydro system provides significant benefit to the community of Kake, however, providing a road link with a new ferry connecting Petersburg to Kupereanof Island expands the road maintenance responsibility of the State DOT, adds an additional ferry to the AMHS system, and increases operational costs for AMHS and SE Region M&O, yet there are no identified savings for adding the link. Given the uncertainty in capital and operating funding for the foreseeable future, the 20-year plan should not include a ferry link or additional road between Petersburg and Kupereanof Island.

Thank you for this opportunity to provide comments on the Draft Southeast Alaska Transportation Plan.

Sincerely,



Rep. Sam Kito III



Sent via email

September 30, 2014

Andy Hughes
Regional Planning Chief
Southeast Region, ADOT&PF
Juneau, AK 99811
Andy.hughes@alaska.gov

Re: 2014 Draft Southeast Alaska Transportation Plan (SATP)

Dear Mr. Hughes:

Please accept the following comments from the Southeast Alaska Conservation Council (SEACC) on the 2014 draft SATP.

SEACC appreciates Alaska DOT's effort to develop a framework for guiding investment in our region's diverse transportation over both the near- and long-term. This effort is substantially undercut, however, by the ongoing haphazard patch job on the Federal Highway Trust Fund – the source of over 90% of the funding for Alaskan transportation projects – as well as expected decline in state revenue. The draft SATP acknowledges that “Alaska may see a decrease in funding in the future.” This fiscal reality weakens a key assumption of the SATP – that “[n]ecessary capital and operating funding will be available for the 20 year plan period.” As a result, the plan fails to help Alaskans prioritize different approaches for capital development of our transportation infrastructure.

State law requires DOT to employ a consistent methodology for analyzing the cost-effectiveness of the transportation options when evaluating new highways and other major components for inclusion in the SATP. Unfortunately, the 2014 draft SATP does not do so. For example, according to the draft SATP, full implementation of the proposed plan will cost “an average of \$61 million a year for new construction and \$67 million a year for refurbishment of existing airports, ferries, terminals and highways” 2014 Draft SATP at p.14. In short, DOT predicts Southeast Alaska can expect \$305 million for new construction over the next 5 years. Yet, according to the schedule and cost estimates provided in Table 2, DOT expects the design and construction of the Katzechin Road, to be completed by 2020 at a cost of \$559 million. DOT's just released draft supplemental EIS for the Katzechin Road estimates the total project cost even higher at \$574 million. So, even if all the available money for Southeast Alaska was spent on this one project, DOT falls \$200 million dollars short. Consequently, DOT's use of this methodology fails to achieve its primary responsibility of ensuring that future transportation

investments are in the public interest or help Alaskans prioritize actions to maintain and improve our transportation infrastructure.

The recently released Draft Supplemental Environmental Impact Statement (DSEIS) for the Katzehin Road further undermines the reasonableness of the recommendations contained in the 2014 draft SATP. Perhaps most surprisingly, the DSEIS found that annual maintenance and operation costs to maintain a new road and ferry terminal in for Lynn Canal will actually increase the state's costs by \$5 million above the costs of simply maintaining the existing ferry system, contrary to a stated purpose for the road extension. So, contrary to the SATP's highway recommendations, and DOT's own analysis in the DSEIS, the most cost-effective investment would call for halting this greater-than-one-half-billion dollar boondoggle and constructing the two new Alaska Class ferries. This approach would double current transportation capacity in Lynn Canal, meeting 95 percent of the traffic demand in Lynn Canal over the next 20 years, and reduce the state's operating costs.

Although one of the SATP goals is "maintain or improve modal safety," DOT makes no effort to compare how well the proposed alternatives meet this goal. The DSEIS for the Katzehin Road anticipates 22 crashes per year – more than 600 crashes and 5 fatalities over the next thirty years on this type of two-lane road. Those estimates don't even take into account the added dangers of avalanches, rockslides, and icing that exist with this particular road. In comparison, no deaths have occurred aboard the Alaska Marine Highway System in over 50 years of service.

The SATP also includes two other dubious highway recommendations. The first connecting Kake and Petersburg via a single-lane gravel road; the second a road between Sitka and Warm Spring Bay. Like the Juneau road extension, we expect that instead of connecting communities, saving time [and reducing state costs](#), these project will end up costing the affected communities and State of Alaska far more than predicted. These are the remaining roads left in the SATP from the 2004 version, often called a "spaghetti map" for the sheer number of new roads proposed in the document. Several of the connections to create the "long drive/short ferry" scenario envisioned in that document were actually constructed, including a terminal on South Mitkof Island south of Petersburg and another one in Coffman Cove on the Northern end of Prince of Wales Island. These facilities have remained mothballed for years because the distances are too great, the population too small, and the inconvenience of hoping on and off, on and off ferries too significant to be viable. Instead of learning from these mistakes, DOT seems to be attempting to make the same ones all over again.

Thank you for your consideration of our comments.

Best Regards,



Buck Lindekugel
Grassroots Attorney

YOUR NAME/ADDRESS/CONTACT #:

Patricia Shearer
P.O. Box 298
Metlakatla, AK 99926

TO: ADOT&PF Southeast Region
6860 Glacier Highway
Juneau, Alaska 99801-7999

DATE: 9-24-14

COMMENTS: With shorter distance between
Annette Bay and Ketchikan we did not
really get a reduced fare. Why is
that? We have very good occupancy
on the runs so we show the need
to do business in Ketchikan and to
link up with Ketchikan Airport for points
North or South.

We know the Lituya needs annual
maintenance but couldn't we do this
when we do not have any discount
fares? We, as Metlakatlans have to
pay high prices for goods, groceries
and hotels so we would appreciate
your understanding of any discount
fares from Alaska Marine Highway.

Sincerely,

Patricia Shearer

**RESOLUTION OF THE BOARD OF DIRECTORS OF
SHEE ATIKÁ, INCORPORATED**

WHEREAS, the Board of Directors of Shee Atiká, Incorporated ("SAI") has responsibility to oversee the assets of SAI;

WHEREAS, SAI has substantial real estate holdings in the Sitka area, including approximately 3,000 acres at Katlian Bay.

WHEREAS the Board believes that long term economic growth in the Sitka area requires that there be an all-weather road to from Sitka to the east side of Baranof Island;

WHEREAS, an all-weather road to from Sitka to the east side of Baranof Island will eliminate approximately 100 miles for ferry traffic between the east and west side of Baranof Island and produce cost savings to the Alaska Marine Highway that will presumably translate into lower fares for travel to and from Sitka;

WHEREAS, an all-weather road to from Sitka to the east side of Baranof Island will greatly reduce the hazards that maritime traffic faces in Peril strait;

NOW THEREFORE BE IT RESOLVED that the Board does hereby endorse efforts to obtain an all-weather road to from Sitka to the east side of Baranof Island;

BE IT FURTHER RESOLVED that the Board does hereby request all Sitka area organizations and land owners to also endorse efforts to obtain an all-weather road to from Sitka to the east side of Baranof Island;

BE IT FURTHER RESOLVED that this resolution shall be effective immediately;

BE IT FURTHER RESOLVED that the officers and agents of SAI be and hereby are authorized to take all action necessary to effect the foregoing resolution.

CERTIFICATION

I hereby certify that the foregoing resolution was adopted by the Board of Directors of Shee Atiká, Incorporated in accordance with its organic documents at a Meeting of said Board of Directors held on August 27, 2011 and said resolution appears in the record of said Meeting as set forth above. Dated this 17th day of October, 2011.

By: Loretta Ness

Loretta Ness, Secretary



September 30, 2014

To Whom It May Concern,

The Sitka Chamber strongly supports the construction of an all-weather road to the east or northeast side of Baranof Island, and while the draft plan recognizes this need, the current proposal is for an Environmental Impact Statement (EIS) and design with actual construction "not anticipated within the 20 year SATP plan period".

Sitka has the third largest population in the region, yet other communities in Southeast Alaska are receiving nearly daily service while Sitka receives almost none. This severely restricts ridership to and from Sitka and creates a real economic hardship for our community. As stated in the draft plan, an all-weather road from Sitka to the east side of Baranof Island would eliminate approximately 120 miles for ferry traffic between the east and west side of the island. The road would produce cost savings to the Alaska Marine Highway that would presumably translate into lower fares for travel to and from Sitka.

Construction of this long awaited road will positively impact economic development projects through increased transportation options; provide affordable transportation to residents, including student travelers; and greatly reduce the hazards maritime traffic faces in Peril Strait. Given this substantial economic benefit to Sitka and Southeast Alaska as a whole, this is a project that should not be put off any longer, but made a top priority.

Jennifer Robinson

Executive Director

Greater Sitka Chamber of Commerce



SITKA ECONOMIC DEVELOPMENT ASSOCIATION

329 Harbor Drive, Suite 212 • Sitka, Alaska 99835 • (907) 747-2660 • fax (907) 747-7688 • www.sitka.net

August 27, 2014

ADOT&PF Southeast Region
6860 Glacier Hwy
Juneau, Alaska 99801-7999
Email dot.satp@alaska.gov

DOT&PF Southeast Region:

In the globalized economy of the 21st Century, the model for economic development and community sustainability is to create strong regional economies. This requires that the communities within a region, such as Southeast Alaska, have reliable, efficient access to one another, not only for the purpose of exchanging goods and services, but also to develop regional industry clusters that can be competitive beyond the region.

SEDA strongly urges the Alaska Department of Transportation (DOT) to invest in improving the services of the Alaska Marine Highway System (AMHS) that are vital to the communities of Southeast Alaska.

SEDA strongly urges the DOT to pursue the extension of existing of road systems and development of new road systems that would tie efficiently to the AMHS.

SEDA believes that the long-term economic health of the community of Sitka and the region of Southeast Alaska requires construction of an all-weather road from Sitka to the northeast or east side of Baranof Island. Such a road will provide stable, reliable access to and from the third largest community Southeast Alaska. The road will also reduce the time and cost of providing ferry service to Sitka, allowing for more efficient use of AMHS vessels in the region.

The DOT admits that the population projections used to develop the plan “do not consider economic development.” Yet, another statement on the same page agrees with SEDA’s position that “*Improving transportation infrastructure remains necessary for the existing population and to support future economic development.*” Page 27 - SATP, 2014 Draft

Points that must be considered when making transportation investment decisions:

1. A well-functioning transportation system increases the investment and productivity of private capital, reduces production costs, increases the size of labor markets, and increases the overall competitiveness of a region in the global economy – creating opportunities for economic development; and
2. A well-functioning transportation system increases safety and convenience, reduces environmental impacts, and improves access to public and private services (education, health care, entertainment, retail, government) – improving quality of life; and
3. Regions with a high quality of life are more attractive to business investment and skilled

- workers; and
4. Improvements in regional economic performance and quality of life provide the needed incentives for residents to remain in rural communities.

In other words, by not investing in improved transportation systems in Southeast Alaska, the State is creating the conditions that will lead to the decreased population that is being used to justify not investing in improved transportation systems; a self-fulfilling prophecy.

“Current thinking on economic development supports the idea that ‘jobs follow people’ into those rural areas that offer a combination of natural and built amenities, quality public services, and adequate infrastructure. These areas are more likely to have growing population, jobs, and income.” (pg. 13, RUPRI Rural Policy Brief: Rethinking Federal Investments in Rural Transportation. April 2011)

Population Considerations

For nearly a century prior to the loss of timber industry jobs, the Southeast Alaska experienced overall population growth, reaching a peak population of 73,830 in 1997.

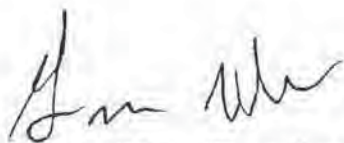
Yes, the population of Southeast Alaska did drop significantly during the decade following closure of the region’s major pulp and sawmills. However, the population decline stopped after 2007, when it bottomed out at 70,219.

Every year since 2007 has seen an overall population increase for the region. As of 2012, the population of Southeast Alaska has exceeded the previous 1997 population peak. The peak population for Southeast Alaska as of 2013 was 74,382. That is a increase of 552 residents vs. the previous 1997 peak and a comparative increase of 4,163 residents over the low of 2007.

Every community and region sees peaks and valleys in population, however the overall long-term trend is growth!

SEDA requests that the State of the Alaska partner with the communities of Southeast Alaska in providing the best ferry service possible to allow us to remain economically viable.

Best regards,

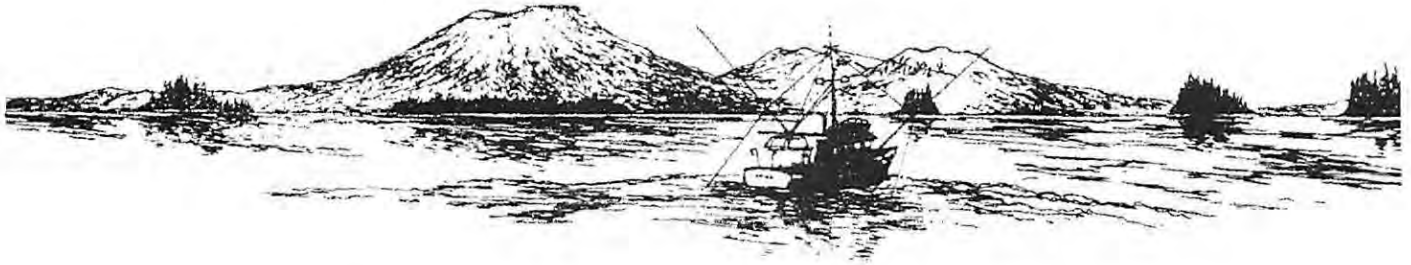


Garry A. White, Executive Director

SITKA SCHOOL DISTRICT

www.sitkaschools.org

300 Kostrometinoff
Sitka, Alaska 99835
Phone: (907) 747-8622
Fax: (907) 966-1260



RESOLUTION OF THE SITKA SCHOOL BOARD OF EDUCATION

RESOLUTION No: 2015-01

IN SUPPORT OF A ROAD FROM SITKA TO THE EAST SIDE OF BARANOF ISLAND

WHEREAS, the Sitka School Board recognizes that students who take part in extracurricular activities do better in studies, have healthier self-esteem and have an easier time making friends, improving their social and interpersonal skills; and

WHEREAS, extracurricular activities include all sports, as well as student government, drama debate and forensics, art, music and world language; and

WHEREAS, according to the Center for Disease Control and Prevention (July 2010), there is a strong correlation between participation in extracurricular activities and decreased high school dropout rates, as well as students showing greater interest in class than students not actively involved in sports; and

WHEREAS, without a road system to connect all Southeast Alaska communities, the Alaska Marine Highway System (AMHS) is relied upon to provide safe, efficient and affordable transportation vital to student travel; and

WHEREAS, the community of Sitka has the third largest population in the region, and yet receive such inadequate ferry service as to render it nearly useless for student travel due to our lack of proximity to the mainline ferry routes; and

WHEREAS, an all-weather road from Sitka to the east side of Baranof Island would eliminate approximately 120 miles of ferry traffic between the east and west side of the island thereby reducing AMHS operational costs and greatly reducing the substantial amount of class time that Sitka's students and coaching staff miss when traveling for activities; and

WHEREAS, the significantly higher cost of air travel, the only mode of transportation currently providing daily service, creates an economic hardship especially for low income families and inequitable opportunities for students; so much so that the Sitka High School Student Council's number one concern is the cost of travel prohibiting any student from participating in extracurricular activities.

NOW THEREFORE BE IT RESOLVED that the Sitka School Board does strongly urge the Department of Transportation and Public Facilities to include not just an Environmental Impact Statement (EIS) and road design, but that it become a top priority construction project within the final 2014 Southeast Alaska Transportation Plan.

Approved on September 10, 2014.


Lon Garrison, President, Sitka School Board

"Educating our children to realize their potential and contribute in a connected global society."



Sitka Tribe of Alaska
456 Katlian Street
Sitka, Alaska 99835
Main: 907-747-3207 Fax: 907-747-4915

September 19, 2014

ADOT&PF – Southeast Region Planning
P.O. Box 112506
Juneau, Alaska 99811-2506

RE: Sitka Tribe of Alaska Comment on the Draft SATP

Dear Mr. Hughes,

On behalf of Sitka Tribe of Alaska (STA), here are my comments on the Draft SATP. Thank you and your team for the presentation of the ADOT&PF's Draft SATP in Sitka on August 20th. The presentation was helpful and greatly appreciated.

Two main comments are important for STA: 1. STA supports the proposed road across Baranof Island - from Sitka to Baranof Warm Springs Bay. Along with the new road, STA supports relocating the Sitka Ferry Terminal - Alaska Marine Highway System (AMHS) to Baranof Warm Springs Bay. STA, for approximately 10 years, has requested improved ferry service to Sitka. Further, STA understands the constraints of budgets that have played a role in the AMHS not being able to improve service to Sitka. It is my understanding that the time, distance and conditions, such as the passage through Peril Strait, have been some of the cited reasons the AMHS has not improved service to Sitka. With that in mind, the road to Baranof Warm Springs Bay, with the AMHS Sitka ferry terminal relocated there, will reduce transportation expenses and improve services to Sitka. The one proviso to supporting this project – twenty years to study the road is too long. There have already been numerous studies over an extended period of time. STA would like to have the goal set to have the road built and operable, with the newly relocated ferry terminal much sooner than the proposed 20 years.

In addition, Mr. Hughes expressed in his presentation the Juneau access road, if built, could also have a positive impact on improved ferry service to Sitka. His rationale was that the current "mainline" ferries would not need to travel up Lynn Canal, thus freeing them up for service to other ports, including Sitka. Therefore, as a further effort to improve ferry service to Sitka, STA supports the proposed extension of the Juneau access road that goes up the east side of Lynn Canal to a terminal that would be constructed at Katzehin (across from Haines). Again, this is with the understanding that STA supports this project in order to see improved ferry service to Sitka.

If you have any questions on STA's comments please feel free to contact the STA Transportation Director, Gerry Hope.

Sincerely,

Michael Baines, Chairman