

Cynthia Jones  
Box 692  
Haines, AK 99827  
30 September 2014

Andy Hughes, Regional Planning Chief  
Department of Transportation and Public Facilities  
PO Box 112506  
Juneau, AK

Dear Mr. Hughes,

I apologize for my attitude, but I am past the point of politely pointing out the physical, financial, public safety, environmental, geological and geographical absurdities of constructing a road along the east side of Lynn Canal. I do not need to. For longer than the 30+ years I have lived in Haines, the governments, Chambers of Commerce, National Park Service, Tourism Departments and individuals of the communities of Skagway and Haines have been listing, describing and pointing out such problems and issues as: destroying sea lion rookeries; multiple avalanche chutes; ice and whiteout conditions in winter; impacting fisheries; over-the-top road maintenance expenses; feeder ferries that won't be able to operate multiple winter and some summer days; creating a less reliable, much more expensive trip between communities. (Foot traffic is essentially eliminated—no Juneau friends will offer to drive the distance to pick us up at Berner's Bay and taxis will cost hundreds of dollars.) You already have the picture. We are and have been unified in our voice for over 30 years: "DO NOT BUILD THIS ROAD. MAINTAIN OUR WORLD CLASS FERRY SYSTEM. IT IS THE **ONLY** RELIABLE FORM OF WINTER TRANSPORTATION BETWEEN SKAGWAY, HAINES AND JUNEAU."

Then, adding insult to injury, the plan is to stop the main line ferries in Juneau. So much for walk-on ferry traffic for Elderhostel groups, tours, and individuals who ride it like a cruise ship journey through the waterways of SE Alaska, renting state rooms and buying meals from Bellingham to Skagway. I have heard many times that the ferry is subsidized (Name a road that is not.). If the system was maintained AND promoted, the subsidies would be considerably smaller. If you spent Alaska's money wisely by maintaining and promoting a unique and amazing system, the attached ad I pulled out of a travel magazine would read, "Highway in Alaskan" rather than "Highway in Norwegian" and we would all see the profits.

If, as you say, this east Lynn Canal road is supposed to "meets the needs of the region's people and economy," then DOT personnel have either: a) **never** traveled between Juneau and the upper Lynn Canal during the winter, b) are very naive, or, c) are planning this never-ending-expensive, boondoggle of a road while willfully and unthinkingly ignoring the real needs (A form of RELIABLE transportation- i.e. ferries- NOT roads nor airplanes) and placing in danger, the lives of the people whose transportation services you are supposed to be improving.

The only 'improvements' this plan provides is improving the possibility, during numerous foul weather days, of stranding customers somewhere along the Upper Lynn Canal, or at the unheated and unstaffed Katzehin Ferry Terminal, or at one of the dozens of avalanche chutes. It also 'provides' *tremendous* public safety issues. As a member of the Haines ambulance crew, I would like to point out that people don't get injured or die on the ferry from dangerous conditions. People WILL get injured or die on an icy exposed road in blizzard whiteout conditions. Those injuries and deaths will be on *your* shoulders.

The front cover of your draft plan says: "Integrity . Excellence . Respect." Demonstrate that DOT actually believes in one of them: **Quit wasting our time and money. STOP this road.**

Quite sincerely,

A handwritten signature in cursive script that reads "Cynthia L. Jones".

Cynthia Jones

**NORWAY**  
POWERED BY NATURE

# HIGHWAY IN NORWEGIAN



*Outdoor adventure  
paradise*



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 **GEIRANGERFJORD**  
FJORD NORWAY

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PLAN AND BOOK   
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September 30, 2014  
Community Development Department  
City & Borough of Juneau

ADOT&PF Southeast Region  
6860 Glacier Highway  
Juneau, AK 99701-7999  
[Dot.satp@alaska.gov](mailto:Dot.satp@alaska.gov)

RE: Southeast Alaska Transportation Plan 2014 DRAFT  
City & Borough of Juneau, Community Development Department Comments

**Plan recommendations:**

- Maintenance of existing AMHS routes
- Retirement of one, two or three mainline ferries depending on available funding and travel demand
- Replacement of other ferries as they reach the end of their useful life
- Completion of the highway to Katzehin and initiation of shuttle ferry service in upper Lynn Canal
- Construction of a road from Kake to Petersburg
- Construction of a road from Sitka to Warm Spring Bay and a ferry terminal
- Construction of an airport in Angoon

Outlined below are citations from the City and Borough of Juneau Comprehensive Plan that are in relation to the Southeast Alaska Transportation Plan 2014 DRAFT Plan Recommendations.

***POLICY 18.5. TO FACILITATE INTERGOVERNMENTAL COORDINATION SO THAT DECISIONS AFFECTING LOCAL PLANNING AND DEVELOPMENT ARE RENDERED IN AN EFFICIENT AND CONSISTENT MANNER.***

The open comment period helps to facilitate the intergovernmental coordination that is a goal and policy for the CBJ.

- **Maintenance of existing AMHS routes**

***POLICY 5.4. TO ENCOURAGE AND SUPPORT REGIONAL ECONOMIC DEVELOPMENT IN OTHER CITIES AND LOCATIONS IN SOUTHEAST ALASKA TO CREATE A LOCAL ENVIRONMENT OF SERVICES AND***

***OFFERINGS ATTRACTIVE TO COMMERCE ORIGINATING FROM OUTSIDE THE CBJ, AND TO ACTIVELY PARTICIPATE IN DEVELOPMENT AND IMPLEMENTATION OF REGIONAL SUSTAINABLE DEVELOPMENT GOALS.***

*5.4.SOP3 Participate in regional planning processes.*

*5.4.IA3 Encourage continued and expanded transportation systems that serve the Southeast Region while retaining those systems currently serving the region.*

Maintenance of the existing Alaska Marine Highway System (AMHS) routes will help meet the goals of the Comprehensive policy above.

- **Retirement of one, two or three mainline ferries depending on available funding and travel demand**
- **Replacement of other ferries as they reach the end of their useful life**

***POLICY 8.4. TO SUPPORT THE IMPROVEMENT OF TRANSPORTATION FACILITIES AND SYSTEMS THAT REINFORCE JUNEAU'S ROLE AS THE CAPITAL CITY OF ALASKA AND A REGIONAL TRANSPORTATION AND SERVICE CENTER.***

*8.4.SOP1 Assume a leadership role in the encouragement of transportation links into and out of the CBJ. Consider all affordable energy-efficient transport alternatives to improve transportation links between the CBJ and other areas of Southeast Alaska, including improved air passenger and cargo service, roadways, ferries, and fixed-guideway systems.*

*8.4.SOP2 Support development of a Lynn Canal Highway, as this facility is important to provide improved transportation to the Capital City for Alaska's citizens, Alaska's legislators, and for the economic well-being of Juneau and the Southeast Region.*

*8.4.SOP3 Support the continued operation and improvement of the Alaska Marine Highway System as an important element of access to and from the CBJ and the rest of coastal Alaska that helps ensure access to the Capital City and coastal communities.*

*8.4.IA2 Improve transportation facilities that accommodate air and marine links between the CBJ and outlying communities.*

*8.4.IA4 When analyzing transportation facility options, consider the life-cycle costs of operation and maintenance on the prospective systems, traveler safety, traveler convenience, the growth-inducing impacts of the project on the community and the affected neighborhoods along the route(s), and the environmental impacts of each option on the affected lands and neighbors, including water quality and air quality (noise, fumes, dust), and energy consumption.*

*8.4.IA5 Implement the improvements called for in the Area Wide Transportation Plan (AWTP) that reinforce Juneau's role as Alaska's capital city and as a regional*

*transportation and service center as funding becomes available. Update and revise the AWTP as necessary. (p. 123-4) (See below for discussion of the AWTP as it relates to the SATP)*

***POLICY 8.6. TO PROMOTE AND FACILITATE MARINE TRANSPORT SYSTEMS AND TO PROVIDE FACILITIES TO TRANSPORT CARGO, VEHICLES, AND PASSENGER TRANSPORTATION, COMMERCIAL FISHING INDUSTRIES, AND RECREATIONAL WATER TRAVEL.***

Addressing the transportation of walk-on passengers between Auke Bay and Katzehin, as well as provision made for bicycle traffic on Glacier Highway, would be supported by the Comprehensive Plan and Area Wide Transportation Plan.

- **Completion of the highway to Katzehin and initiation of shuttle ferry service in upper Lynn Canal**

***POLICY 13.2. TO PROVIDE ADEQUATE AND EFFICIENT FIRE PROTECTION AND FIELD EMERGENCY MEDICAL CARE FOR ALL. IT IS FURTHER THE POLICY OF THE CBJ TO MAINTAIN AN INCIDENT RESPONSE ORGANIZATION TO EFFECTIVELY RESPOND TO LARGE-SCALE EVENTS AND DISASTERS.***

The Comprehensive Plan does support the extension of Glacier Highway. Though, construction and completion of a highway extending from the end of the road to the Katzehin flats will increase demand for CBJ emergency responses to service that area. This increase in demand will require additional Capital City Fire Rescue staff over current levels. With current staff levels, emergency response to this area would take responders from their current area of service and would place them farther from other areas that might need their attention.

- **Construction of a road from Kake to Petersburg**
- **Construction of a road from Sitka to Warm Spring Bay and a ferry terminal**
- **Construction of an airport in Angoon**

***POLICY 5.4. TO ENCOURAGE AND SUPPORT REGIONAL ECONOMIC DEVELOPMENT IN OTHER CITIES AND LOCATIONS IN SOUTHEAST ALASKA TO CREATE A LOCAL ENVIRONMENT OF SERVICES AND OFFERINGS ATTRACTIVE TO COMMERCE ORIGINATING FROM OUTSIDE THE CBJ, AND TO ACTIVELY PARTICIPATE IN DEVELOPMENT AND IMPLEMENTATION OF REGIONAL SUSTAINABLE DEVELOPMENT GOALS.***

*5.4.SOP3 Participate in regional planning processes.*

5.4.IA3 Encourage continued and expanded transportation systems that serve the Southeast Region while retaining those systems currently serving the region.

**From the Area Wide Transportation Plan (2001):**

***Public safety is of paramount concern.***

*Measures that enhance safety for users of the transportation system will be carefully reviewed, evaluated, selected, and recommended.*

***The community's transportation system must provide people with more transportation choices.***

*The transportation plan must recognize that transportation is more than just vehicles and pavement, and must encourage diversity in travel options.*

***Bicycles provide a low-cost alternative to automobiles.***

*Surface transportation needs to be improved so that it works as well for bicyclists as it does for other vehicle operators.*

***Travel by foot needs to be safe and convenient.***

*The addition of pedestrian facilities at many locations is needed to provide for all travelers, including children, the elderly and the disabled.*

***Public transit has a significant role in moving people.***

*Opportunities to improve transit operations and route efficiency and to increase ridership and capacity will be identified and pursued.*

*Federal transportation policy provides a framework for federal and state transportation investments. In seeking transportation improvement, it is best to begin by investing in existing facilities, followed by improving their efficiency, especially where the facility connects transportation nodes. Investing in new transportation facilities may make sense, but it needs to build on improvements to the existing transportation system. (p. 4-5)*





# KETCHIKAN GATEWAY BOROUGH

1900 First Avenue, Suite 210, Ketchikan, Alaska 99901

• telephone: (907) 228-6625 • fax (907) 228-6684

Office of the Borough Manager

September 5, 2014

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

Subject: "Southeast Alaska Transportation Plan - 2014 Draft"

Dear Mr. Hughes:

This letter provides comments on behalf of the Ketchikan Gateway Borough regarding the "Southeast Alaska Transportation Plan - 2014 Draft" (SATP). The Ketchikan Gateway Borough Assembly addressed the SATP in Resolution No. 2556 (copy enclosed).

In summary, the comments relate to four primary issues:

1. Gravina Access;
2. Ketchikan International Airport;
3. The reduction of AMHS service in southern Southeast Alaska; and
4. The prospective transfer of responsibility of certain State-maintained local roads to local municipalities.

### **Gravina Access:**

Gravina Access is a major concern of the Ketchikan Gateway Borough, as emphasized in Assembly Resolution No. 2525 (see attachments to Resolution No. 2556). As reflected in Resolution No. 2525, the Borough is awaiting the decision regarding the preferred alternative for improved Gravina Access.

The SATP included only a most-cursory reference to Gravina Access in Table 4 of page 47 with a cross-reference to the map on page 41. The Borough requests that the SATP address this major project in greater detail. For example, it would be helpful to understand why seven years have passed without completion of a final supplemental environmental impact statement for the project. An updated schedule for a determination of the preferred alternative would also be appreciated.

### **Ketchikan International Airport**

The comment on page one of the SATP that ADOT&PF operates all airports in Southeast Alaska "with the exception of Juneau International Airport, Craig seaplane terminal, and several private commercial seaplane terminals" is a glaring misstatement. Of course, the Ketchikan Gateway Borough operates the State-owned Ketchikan International Airport.

Among the more than 250 State-owned airports, the Ketchikan International Airport is the only one operated by a local government.



The Ketchikan International Airport is one of three State-owned airports that are operated on an enterprise basis – the other two being the Ted Stevens Anchorage International Airport and Fairbanks International Airport.

The Anchorage and Fairbanks International Airports have far greater traffic compared to Ketchikan, making it much easier to operate those airports on an enterprise basis. For example, Anchorage serves approximately 5 million passengers annually, more than 20 times the number served in Ketchikan. Anchorage International is also the #2 ranked airport in the nation for landed weight of cargo aircraft, and is among the top 5 in the world for cargo throughput. Fairbanks has more than four times the passenger volume compared to Ketchikan.

The Ketchikan International Airport is one of only 18 primary certificated State-owned airports outside of the Anchorage and Fairbanks airports. None of the other 17 State-owned primary certificated airports is operated on an enterprise fund basis.

Only about 16% of the cost of operating the 17 State-owned and State-operated primary certificated airports is funded by revenues generated at those airports, leaving the State to support the remaining 84%.<sup>1</sup>

Circumstances are far different for the 18th State-owned primary certificated airport. The Ketchikan Gateway Borough will spend an estimated \$4,820,729 in the current year to operate that airport. The State provides \$400,000 in funding to support the Ketchikan operations. While that \$400,000 in funding is certainly appreciated, it is patently obvious that the level of State support for the Ketchikan Airport is grossly disproportionate compared to the State support provided for other airports.

The \$400,000 provided to Ketchikan represents only 8% of the operating cost. That compares to the 84% rate for the other primary certificated airports noted above.

The SATP notes the objective to “ensure greater equity between communities” with respect to some matters.<sup>2</sup> The Ketchikan Gateway Borough urges greater equity in terms of the growing local burden for operating the State-owned Ketchikan International Airport.

It is noteworthy that ADOT&PF recognizes significant challenges in attempting to increase revenues at the other 17 State-owned primary certificated airports.<sup>3</sup> These include:

1. Increased prices which could further increase the cost of living in affected communities.
2. Discouraging economic opportunities in affected communities.
3. Public discontent with raising fees.
4. Concerns over equity in that certain revenue measures could not be implemented at the 235 State airports that are not primary certificated airports.

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<sup>1</sup> *Landing Fee Report*, State of Alaska Department of Transportation and Public Facilities, p. 7 (December 2013).

<sup>2</sup> *Id.*, p. 20 (Action 3.7).

<sup>3</sup> *Id.*, p. 3.

Those same four concerns weigh heavily on efforts by the Ketchikan Gateway Borough to operate the Ketchikan Airport on an enterprise fund basis.

#### **Reduction in AMHS Service**

The Ketchikan Gateway Borough opposes the recommended reduction in AMHS service to southern Southeast Alaska. Local communities in Southeast Alaska depend on the AMHS for travel and movement of goods. Although, the ADOT&PF defends the reduction in service with 2010 census population data, average trip counts, and passenger data, the Borough voices its strong opposition to the proposed reduction in service.

#### **Transfer of Certain State-Maintained Roads to Municipalities.**

The Borough opposes the transfer of State-maintained local roads to municipalities. The Ketchikan Gateway Borough does not exercise areawide road powers. Therefore, the Borough does not maintain roads that are not located within road service areas. Should ADOT&PF turn over local roads to the Borough without first establishing service areas, those roads will become derelict and fall into disrepair. The Borough requests that ADOT&PF continue to fully fund maintenance of ADOT&PF owned local roads.

Moreover, unless the State created State service areas in the unorganized borough under AS 29.03.020 to fund maintenance of local roads in the unorganized borough, the practice of transferring roads to municipalities will create further inequities among Alaskans and will also establish greater disincentives to form boroughs. Alaska's Constitution (Article X, Section 3) encourages the formation of organized boroughs. The proposal would have the opposite effect.

#### **Conclusion.**

Elements of the SATP about which concern is expressed above and in the enclosed comments appear to conflict with policies set out in ADOT&PF's "Alaska Statewide Transportation Plan." Specifically, conflicts seem to exist with regard to Policy 1, Policy 3, Policy 5, and Policy 13 as those policies are summarized in Figure 3, page 7 of the SATP.

Ketchikan Gateway Borough officials look forward to your consideration of these comments.

Sincerely,



Dan Bockhorst  
Borough Manager

Enclosures:  
Ketchikan Gateway Borough Resolution No. 2556

# KETCHIKAN GATEWAY BOROUGH

## RESOLUTION NO. 2556

**A Resolution of the Assembly of the Ketchikan Gateway Borough, Directing the Manager to Submit Comments to the Alaska Department of Transportation and Public Facilities Regarding the 2014 Southeast Alaska Transportation Plan**

### RECITALS

- A. WHEREAS**, the Alaska Department of Transportation and Public Facilities (ADOT&PF) has developed the 2014 Southeast Alaska Transportation Plan (SATP) and has requested comments from local communities by August 30, 2014; and
- B. WHEREAS**, the Borough staff has developed a list of comments, Exhibit A, related to those recommendations within the SATP that have an impact on the borough; and
- C. WHEREAS**, the Assembly concurs with the comments in Exhibit A and directs the Borough Manager to submit the comments expressed in Exhibit A to ADOT&PF; and
- D. WHEREAS**, the Assembly believes that the comments provided in Exhibit A are in the best interests of the borough and its residents.

**NOW, THEREFORE, IN CONSIDERATION OF THE ABOVE FACTS, IT IS RESOLVED BY THE ASSEMBLY OF THE KETCHIKAN GATEWAY BOROUGH** as follows:

**Section 1.** The Borough Assembly directs the Borough Manager to submit the comments listed within Exhibit A to ADOT&PF for its consideration.

**Section 2.** Effective Date. This resolution shall be effective upon adoption.



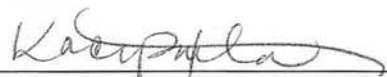
ADOPTED this 18<sup>th</sup> day of August, 2014.



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Dave Kiffer, Borough Mayor

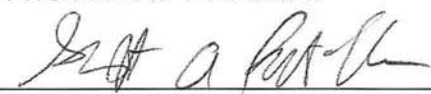
ATTEST:



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Kacie Paxton, Borough Clerk

APPROVED AS TO FORM:



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Scott A. Brandt-Erichsen, Borough Attorney

**EXHIBIT A**  
**Borough's Comments for the**  
**Southeast Alaska Transportation Plan 2014 Update**

**SATP Concerning Statements**

1. Quotes

- a. *"The Department operates the airports and seaplane terminals with the exception of Juneau International Airport, Craig seaplane terminal, and several private commercial seaplane terminals."* (page 1)
  - i. Ketchikan International Airport and Murphy's Seaplane Landing are operated by the Ketchikan Gateway Borough, not the State of Alaska. The Borough requests correction of this statement.
  - ii. In total, the State of Alaska owns and operates 34 seaplane floats, and 222 airports, including 21 primary airports (those that are certificated by the FAA under the federal government's Part 139 regulations, and operated to meet those crucial standards and guidelines). 33 of the State-operated seaplane floats and 10 of the State-operated airports (including 5 State-operated certificated airports) are in Southeast Alaska.
  - iii. The Ketchikan International Airport is the only State-owned airport in Alaska that is operated by a local government. Moreover, it is only one of four major airports in Alaska that are operated on an enterprise fund basis – Anchorage, Fairbanks, and Juneau being the others.<sup>1</sup> Ketchikan does not have enough traffic to be fully self-supporting. The numbers of enplanements during the 2013 calendar year for airports in Alaska that are operated on an enterprise fund basis are:
    1. Anchorage: 2,325,030 (21.25 times Ketchikan's enplanements);
    2. Fairbanks: 457,372 (4.20 times Ketchikan's enplanements);
    3. Juneau: 321,573 (2.95 times Ketchikan's enplanements);
    4. Ketchikan: 109,433.

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<sup>1</sup> Anchorage and Fairbanks airports are both funded and operated by the State of Alaska International Airport System enterprise fund. Juneau's airport is owned and operated by the City and Borough of Juneau.

- iv. Bethel Airport saw 152,084 enplanements in 2013 (1.4 times Ketchikan's enplanements); but remains a state funded and operated airport.<sup>2</sup>
- b. *"The SATP recommends a capital improvement program of major projects needed to meet regional transportation needs."* (page 6) Specifically AMHS replacement
  - i. Gravina Access, a major project for Ketchikan's regional transportation needs has been overlooked. The SATP 2014 Update does not include the Gravina Island Access project for the 20 year horizon of the plan. However, as has previously been discussed in great detail, significantly improved access to Gravina Island is of the utmost importance to Ketchikan, both for reducing operations and maintenance costs for the airport and the area's economy.
  - ii. Resolution No. 2525, adopted by the Ketchikan Gateway Borough Assembly on January 6, 2014, reflects the current formal position of the Borough Assembly regarding Gravina Access. A copy of Resolution No. 2525 is attached.
- c. *"The SATP is the appropriate forum for consideration of mode-specific major capital airport project needs. However, with some exceptions, the key components of the region's airport system are already in place."* (page 6)
  - i. The Ketchikan International Airport has capital project needs that must be funded to ensure adequate service to the public. These needs are not addressed within the SATP 2014. The Borough requests that the projects listed within the following table be included as part of SATP 2014 capital project needs:

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<sup>2</sup> Federal Aviation Administration, Airport Data and Contact Information. (Published June 20, 2014)  
[http://www.faa.gov/airports/planning\\_capacity/passenger\\_allcargo\\_stats/passenger/media/preliminary-cy13-commercial-service-enplanements.pdf](http://www.faa.gov/airports/planning_capacity/passenger_allcargo_stats/passenger/media/preliminary-cy13-commercial-service-enplanements.pdf)



ADA Access ramp to Seaplane Dock (Airport Priority #1)	\$240,000
Seaplane Pullout and Dock Repair (Airport Priority #2)	\$900,000
ARFF Building Remodel (Airport Priority #3)	\$1,000,000
Water Rescue Boat (Airport Priority #4)	\$60,000
Brush Cutting Hoe (Airport Priority #5)	\$398,720
Fence Replacement and Gate Repair (Airport Priority #6)	\$120,000
Total	\$2,718,720

d. *If a third mainliner is retired without replacement (due to reduction of funding) then Prince Rupert will be served by one mainliner, likely with a reduction in service from four port visits per week to two or three. (page 14)*

i. The reduction in port visits per week is undesirable as it will affect Ketchikan’s economic vitality. The Borough has been working diligently with elected officials in Prince Rupert to develop a sister city relationship for both interstate commerce as well as recreation. Decreasing the number of port calls during the summer months will lessen the already shaky connection that our cities possess.

**Reduction in state and federal funding for transportation**

1. FAA Modernization and Reform Act of 2012 expires in September 2015 (Airport funding)
2. Moving Ahead for Progress in the 21<sup>st</sup> Century Act expires in September 2014 (Highway and Ferry funding)
3. The federal highway trust fund is no longer sufficient to cover surface transportation needs and must be supplemented by the federal general fund, or restructured. (page 2)
4. Oil production is decreasing and in turn decreasing revenue. (page 2)

**Ketchikan Concerns**

1. Airport

a. Ketchikan is the only local government to operate a State-owned airport. Currently, ADOT&PF provides operating support in the amount of \$400,000 annually, which is not sufficient to fund the Ketchikan International Airport. As

of June 30, 2013, the Borough had lost \$687,006 (including the State's contribution of \$2.5 million to partially offset the cash deficit in operations and maintenance costs) since the Borough took over management of the airport in 1985 (audited figures). As of May 31, 2014, the cumulative cash loss, net of the State's offsetting \$2.5 million payment, grew to \$863,514.

- b. Recently, the annual operating loss to the Borough has been reduced to a range of \$200,000 to \$285,000 through fee increases on Airport users. However, challenges and ever growing fiscal burdens lie ahead. These include:
  - I. The addition of next generation airliners that are expected to begin regular service in 2016; the FAA requirements would double the number of Aircraft Rescue & Fire Fighting (ARFF) personnel and fire trucks that must be ready to respond at each landing. These additional requirements will increase the Airport operating costs by approximately \$300,000 annually; and
  - II. Expected decreases in federal funding that helps meet federally mandated airport security requirements; and
  - III. Growing costs for operation and maintenance of the two-vessel fleet of ferries that provide the only access from Ketchikan to the airport.
- c. The fiscal challenges listed above cannot be addressed by raising user fees and fares because such increases would exceed market rates and may hurt the airport's operations. The increases in ARFF costs due to the next generation aircrafts scheduled for next year are costs which cannot be passed along to the airlines without severely impacting air service to the Ketchikan airport.
- d. Given the circumstances above, the Borough considers it essential that the State of Alaska examine its level of support for operations of the Ketchikan International Airport in relation to other airports in Alaska to ensure equity and fairness.

## 2. Bridge to Gravina Island

- a. The SATP does not include the bridge to Gravina Island (location of airport) as a capital project. The SATP does include the connection as an essential transportation and utility corridor for regional development priorities.<sup>3</sup>
- b. The Borough desires improved access to Gravina as reflected in Resolution No. 2525 adopted by the Assembly on January 6, 2014.
  - i. Not including improved Gravina Access in the SATP is contrary with the statewide transportation plan policies one, two, seven, 13, and 14.<sup>4</sup>

### 3. Alaska Marine Highway System

- a. Three aging ferries which serve Ketchikan are recommended to be retired or replaced by 2024; Malaspina, Taku, and Matanuska.
- b. The AMHS is a primary transport of goods and travel for the people in Southern Southeast. The ADOT&PF presented six alternatives for this update to the SATP all to include the building and inclusion of two Alaska Class Ferries (ACF). However, the alternative (Alternative two, page 67) the department decided on appears to limit Southern Southeast's frequency of ferry trips, specifically in the summer months. (page 69)
- c. The Alternative two appears to have a lower capital outlay associated with it than Alternative four; however, the operations and maintenance will be greater in the 20 year estimates.
- d. Alternative four proposes to construct highway-shuttle ferry system, providing more frequent opportunities to travel between communities within Southeast. This option would create additional roads to shorten the marine voyages between landing sites. Traveling through Southeast would be by using a mix of roads and short ferry trips.

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3 Appendix A: Essential Transportation and Utility Corridors, Regional Development Priorities, page 31. Referenced page 47 as map segment number 107.

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

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

Policy 7 Identify system development needs that address travel demand growth, economic development and funding strategies through regional and metropolitan plans.

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

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



- i. For example, ferry from Prince Rupert to Ketchikan ferry to Prince of Wales Island, drive through Prince of Wales, ferry to South Mitkof ferry terminal, drive to Petersburg or Kake continuing north.
- ii. If continuing the current ferry routes is untenable, alternative four would be the best option for the Borough due to the potential increase in mobility for Southeast residents. Alternative four also appears to be more of a "marine highway system" than the existing ferry system which more represents a longer range system, such as a train.

#### 4. Regional Rail Development

- a. The rail development discussion is specific to Haines and Skagway in response to the significant potential for mineral development in the Yukon. (page 6)
  - i. However, there is little discussion regarding the mineral deposits of Prince of Wales and the transportation needs for the industry there. The Borough encourages ADOT&PF needs to include additional mention of the potential of mineral development on Prince of Wales.
- b. The SATP will defer to the recommendations and findings of the Alaska State Rail Plan.

#### 5. Local Road Maintenance

- a. Action 3.7 from "Let's Get Moving 2030 Statewide Policy Plan" proposes to transfer ownership of local roads to local communities.
- b. The Borough takes the position that this to be an overreach of state government, attempting to force State developed roads on a municipality to maintain and operate. The Ketchikan Gateway Borough does not exercise areawide or nonareawide road powers, and if roads are abandoned by the State of Alaska without service areas established, the roads will not be maintained. If the State takes such actions within the boundaries of boroughs, it should take similar action throughout the unorganized borough. If the State imposes burdens on city and borough governments, it should impose identical burdens on the unorganized borough through State-established and locally supported service areas as permitted by AS 29.03.020.

#### 6. Essential Transportation and Utility Corridors, Regional Development Priorities

- a. The Borough Assembly supports the Essential Transportation and Utility Corridors, Regional Development Priorities appendix (page 31) as an official expression of state policy that no other action by any other party should be taken (such as designations of wilderness areas) that would interfere with public use of any of the specified corridors. The Borough Assembly takes the position that the corridors identified in the appendix represent a transportation system that would provide the Borough and Southern Southeast a network of marine and highway systems to increase mobility with the capital city and Canada, increasing trade and commerce.
- b. As stated above, the Gravina Island connection needs to be on the capital project list to be implemented in the next few years. The connection is more important than just a connection to the airport. The connection represents potential economic prosperity through future development of deep harbors and expansion.

## KETCHIKAN GATEWAY BOROUGH

### RESOLUTION NO. 2525

**A Resolution of the Assembly of the Ketchikan Gateway Borough Reiterating, on the Eve of the Scheduled Commencement of the Preparation of the Final Supplemental Environmental Impact Statement for the Gravina Access Project, the Assembly's Adamant Opposition to the "No Action Alternative" and its Endorsement of Alternatives "F3" and "C3-4" (Without Tolls)**

#### RECITALS

- A. WHEREAS**, on January 7, 2014, the Alaska Department of Transportation and Public Facilities (DOT&PF) and the Federal Highway Administration (FHWA) are scheduled to begin preparation of the Final Supplemental Environmental Impact Statement (SEIS) for the Gravina Access Project, which was initiated on July 2, 2008; and
- B. WHEREAS**, the Final SEIS, which is expected to be released for public comment on May 19, 2014, will identify a preferred alternative for Gravina access and explain why it was selected; and
- C. WHEREAS**, the FHWA is scheduled to issue its Record of Decision selecting the preferred alternative for Gravina access on August 20, 2014; and
- D. WHEREAS**, the State of Alaska is facing growing fiscal challenges as reflected, for example, in the December 4, 2013 projection by the Alaska Department of Revenue that State General Fund unrestricted revenues will drop 29 percent in FY 2014 and will drop an additional 8 percent the following year; and
- E. WHEREAS**, the federal government, which is projected to fund 64 percent of State's proposed FY 2015 Capital Budget and 29 percent of the State's proposed FY 2015 Operating Budget, is also facing growing fiscal challenges as reflected, for example, in the December 3, 2013 report titled *The Federal Government's Long-Term Fiscal Outlook* by the U.S. Government Accountability Office stating that, "the federal government is on an unsustainable long-term fiscal path;" and



- F. WHEREAS**, the Assembly is concerned that the fiscal challenges facing our state and federal governments may unjustly influence the determination of the preferred alternative for Gravina access, while at the same time other high-profile transportation projects in Alaska are proceeding (e.g., the \$500 million dollar Juneau Access project for which \$35 million is included in the proposed FY 2015 Capital Budget and the \$850 million first-phase Knik Arm Bridge project for which \$55 million is included in the proposed FY 2015 Capital Budget); and
- G. WHEREAS**, the Assembly prompts those who will be selecting the preferred alternative for Gravina Access to keep in mind that improved access to Gravina Island, for which the Borough has struggled for over 40 years, is critical to economic development in the Ketchikan Gateway Borough, a region in which a mere three-tenths of one percent of the land is taxable; and
- H. WHEREAS**, the Assembly also urges decision makers to take into account that improved access to Gravina Island is vital to making Alaska's fifth busiest airport more readily reachable to residents of Southeast Alaska in times of emergency and for everyday travel; and
- I. WHEREAS**, the Assembly implores decision makers to keep in mind that \$209.3 million of the \$364.3 appropriated for the Gravina Access project has previously been reallocated for projects in other communities.

**NOW, THEREFORE, IN CONSIDERATION OF THE ABOVE FACTS, IT IS RESOLVED BY THE ASSEMBLY OF THE KETCHIKAN GATEWAY BOROUGH** as follows:

**Section 1.** The Assembly hereby affirms its endorsement of F3 and C3-4 Alternatives (without tolls) as best meeting the goals of more reliable, efficient, convenient, and cost-effective access to the Ketchikan International Airport, and promoting long-term economic development on Gravina Island as outlined in Resolution No. 2495-A, which is incorporated into this resolution by reference.

**Section 2.** The Assembly again states its adamant opposition to the No Action Alternative, which would result in no improved access to Gravina and the likely reallocation of the remaining \$96 million in Gravina Access funds for other projects.

Construction of the C3-4 alternative could be completed with additional funding estimated at \$127 million while construction of the F3 alternative could be completed with additional funding estimated at \$180 million.

In selecting a new preferred alternative for Gravina Access, DOT&PF is urged to



formally commit to the pursuit of the remaining funds needed for construction of the C3-4 or F3 options. For example, funding of the C3-4 alternative could be achieved incrementally at the rate of \$25.4 million per year for five years, while funding of the F3 alternative could be achieved at the rate of \$36 million each year for five years.

**Section 3.** If DOT&PF is unwilling or unable to formally commit to the pursuit of additional funding to construct the C3-4 or F3 alternatives, *and* if DOT&PF is consequently inclined to favor the No Action Alternative, the Assembly urges that DOT&PF choose, instead, improved ferry service with the following elements:

- (1) That the ferry system would continue to operate 16 hours per day unless and until demand warrants expanded hours of operation;
- (2) Purchase and development of the property adjoining the west end of the existing Airport parking area on Revillagigedo Island to provide additional parking and space for improvements;
- (3) Construction of a new Airport terminal on the property adjoining the existing Airport parking area on Revillagigedo Island where departing travelers will check their baggage and check in for flights, and arriving passengers will receive their baggage;
- (4) Reconstruction of the existing airport ferry transfer bridges and ramps;
- (5) Construction of one additional ferry transfer bridge and ramp on Gravina Island near the existing ramp and one additional ferry transfer bridge and ramp on Revillagigedo Island at the property adjoining the existing Airport property. This will ensure continued access when the existing single transfer bridge and ramp system is unavailable because of scheduled or unscheduled maintenance and repairs;
- (6) Provide upgrades and improvements for all sidewalks and wheelchair ramps associated with the Airport ferry facilities to meet applicable standards;
- (7) Provide funds to purchase and operate two shuttle vans to transport handicapped, infirm, and elderly passengers between Revillagigedo Island and Gravina Island;
- (8) Construction of a new heavy freight dock on Gravina Island for highway loads that cannot be accommodated by the shuttle ferry;
- (9) Replacement of the existing ferry layup dock and transfer bridge to support layup and maintenance of the airport shuttle ferry system;
- (10) As an alternative to a lay-up dock for ferries, improved facilities for freight and fuel barges, and a heavy freight terminal on Gravina Island, an alternative of combining these facilities into a multi-modal facility and incorporating a freight dock of at least 250' by 75' should be evaluated;



- (11) Recognize in the Record of Decision that it would be reasonable to expect that the State will fund replacement ferries and replacement shuttle vans in the future when needed to continue to provide access to the State-owned Ketchikan International Airport, presently the fifth busiest airport in Alaska (it is acknowledged that DOT&PF cannot formally commit to future funding of replacement ferries and shuttle vans);
- (12) Provide an endowment with any remaining funds to subsidize ferry operations to keep ferry fares reasonable and affordable for all users.

**Section 4.** The Borough Clerk is directed to promptly send a copy of this resolution to the following:

Executive branch officials of the State of Alaska:

- A. The Honorable Sean Parnell, Governor for the State of Alaska
- B. Patrick Kemp, Commissioner of DOT&PF
- C. Al Clough, Assistant Commissioner and Southeast Region Director of DOT&PF
- D. Jim Lowell, P.E., Gravina Access Project Manager for DOT&PF

Executive branch officials of the federal government:

- A. Victor Mendez, Administrator of the FHWA
- B. David Miller, Division Administrator, Alaska Division, FHWA
- C. Kris Riesenberg, Transportation Planner, FHWA

Congressional Delegation:

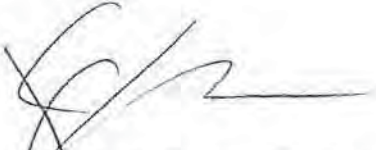
- A. The Honorable Lisa Murkowski, United States Senator for Alaska;
- B. The Honorable Mark Begich, United States Senator for Alaska;
- C. The Honorable Don Young, Congressman for Alaska;

State Legislators

- A. The Honorable Bert Stedman, Member of the Alaska State Senate serving Ketchikan;
- B. The Honorable Peggy Wilson, Member of the Alaska State House of Representatives serving Ketchikan;

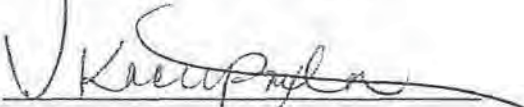
**Section 5.** This Resolution shall be effective immediately upon adoption.

ADOPTED this 6<sup>th</sup> day of January, 2014.



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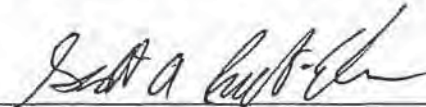
Dave Kiffer, Borough Mayor



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Kacie Paxton, Borough Clerk

APPROVED AS TO FORM:



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Scott A. Brandt-Erichsen, Borough Attorney



Sept. 28, 2014

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

[dot.satp@alaska.gov](mailto:dot.satp@alaska.gov)

Dear SATP “Kake Access” Planning team,

Below are comments I previously submitted regarding the Purpose/Need statement for the Kake/Petersburg road. I am recycling them because they are equally useful in this phase of SATP planning. In short, I do not support this fiscally irresponsible, ill conceived project, and request that continued mainline ferry service as the preferred alternative for transportation in SE Alaska. This is the will of the majority of SE Alaskans and you are obligated to consider and evaluate their concerns.

Sincerely,

Rebecca Knight  
PO Box 1331  
Petersburg, AK 99833

Proposed Kake Access EIS  
Comments to the Draft Purpose and Need Statement  
by  
Rebecca Knight

August 4, 2013

Mike Traffalis, Project Manager  
Kake Access EIS  
Federal Highway Administration

Western Federal Lands Highway Division

610 East Fifth Street

Vancouver, WA 98661-3801

Dear Mr. Traffalis,

Following are my comments for the proposed Kake Access Draft Purpose and Need Statement for the Kake Access EIS. Obviously some of my comments can also be applied to the scoping phase of the analysis.

Although this project is identified as the Kake **Access** EIS, it appears the analysis will ultimately be used to justify a **road** link between the communities of Kake and Petersburg. Multiple references to this link should be removed from the draft P & N statement to avoid biasing decision makers toward this option, and prevent the required “hard look” at a full range of alternatives.

There is no doubt that Kake is isolated, that adequate medical services are lacking, and the price of goods and services are high. However this situation is not unique to Kake and is the circumstance of most communities in SE and greater Alaska. I believe an honest environmental analysis will conclude that a road will not improve Kake’s troubles, and in fact result in negative impacts to all the affected communities of Kupreanof and Petersburg as well as Kake. Although I fully support the NEPA process, I do not believe an expensive environmental analysis is needed to evaluate the impacts because it is apparent that this project is a pie-in-the-sky fantasy of a few powerful legislators who control State purse strings and thus their own personal legislative priorities. For the reasons listed below, a Petersburg/Kupreanof/Kake road/ferry link is clearly “unreasonable” from the outset and should be relegated to “alternatives eliminated from consideration”.

## **Comparison to the South Mitkof Ferry Terminal and Inter-Island Ferry**

or

### **Insanity: doing the same thing over and over again and expecting different results.**

Despite warnings by the public early on, the South Mitkof Ferry Terminal was an expensive and abysmal failure. It has been closed for years although approximately \$20 MM (maybe more) was invested in the facility including extension of a paved road ending at the terminal. It was an expensive experiment.

According to the general purpose and need for the Mitkof project:

“The primary drivers for the new terminal were to reduce system costs, improve service, and develop greater connectivity in the service area. For a sustained period of years the Alaska Legislature has, through various means, conveyed to the Alaska Marine Highway System (AMHS) a consistent determination to reduce the annual General Fund subsidy essential to operating the system. In addition, the public and communities served by AMHS desire a regional transportation system that is more flexible, frequent in service, efficient, reliable, convenient, and stable. Providing meaningful service improvements and cost reductions requires that AMHS revise its operations as outlined in the Southeast Alaska Transportation Plan (SATP). A key element of the SATP is the development of new ferry terminals, including the South Mitkof Island Ferry Terminal. The SATP also has identified a need for greater connectivity and the development of local ferry service. In response, IFA is now expanding its operations to the north end of Prince of Wales Island with a new ferry, a new terminal at Coffman Cove, and service to a terminal at the south end of Mitkof Island.”<sup>1</sup>

As you can tell, the “Kake Access Project” purpose and need description is nearly identical to the South Mitkof Island Ferry Terminal’s. The Mitkof facility was intended to serve a much greater population base than the Kake project yet it did not survive the lack of ridership despite a second attempt after the first and operation under new management. A nearly new facility, it sits completely empty today as it has for years. Given the utter failure of the S. Mitkof facility, I have little confidence

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<sup>1</sup> American Society of Civil Engineers. Conference Proceeding Paper. Abstract. Ports 2007: 30 years of sharing ideas: 1997-2007.

that a Kake Access road extension and ferry facility to Petersburg will succeed. I predict, if it is approved it will also fail but the cost will be more staggering than the S. Mitkof project.

Although you may assert this is “outside the scope” of your analysis, I believe it is incumbent that you responsibly disclose why a Kake Access link would be so different and succeed. Do we learn any lessons from the past or is this just another symptom of insanity?

### **Demographics 101**

The demographics for a Kake to Petersburg road link simply do not justify construction of a multi-million dollar road for a community of 500 people, native or otherwise. And this is not to mention the environmental impacts associated with a project of this size. The legislators that irresponsibly authorized this expenditure, without consulting local citizens whether they supported the appropriation, represent the epitome of why most Americans consider Alaska a welfare state.

The waters of SE Alaska are our “highway”, don’t require maintenance, are safe for ferry travel, and experience little to no environmental impact from traveling upon them. Many of Kake’s woes would be rectified if the political will to provide better mainline ferry service existed. And as an added benefit, a time and money wasting EIS process would not be required. The State should provide improved mainline ferry service, especially in the winter – not an expensive road/ferry crossing that links communities.

### **Fiscal Waste**

The proposed project is a colossal waste of public money and time regardless of which alternative the FEIS and ROD finally support - including the No Action. The waste begins with the formal NEPA process currently budgeted at \$5 MM billed from a \$40 MM State of Alaska appropriation for a Kake to Petersburg Northern Route alignment. Considering the current population of Kake, the appropriation amounts to a per person subsidy of \$72,000. This figure will no doubt increase dramatically if a road is chosen over improved mainline ferry service since the cost of road construction and shuttle ferry infrastructure will no doubt far exceed the initial appropriation. Simple logic should prevail by eliminating from further consideration the construction of a Kake road link.

Enough said. I understand you have no control over the appropriation and are simply doing your job.



Regardless, cost/benefit effectiveness should be identified as a significant issue in driving alternative development and the full costs of the project should be disclosed. This includes the entire cost of the project including all associated infrastructure including but not limited to the entire cost of planning and environmental analysis, construction, Lidar transects, potential shuttle ferries and docks, staffing and overhead, administration, year 'round maintenance including snow removal and prevention of blocked culverts that impede fish passage - a chronic problem on the Tongass National Forest which the Feds cannot afford to remedy.

The State DOT continually experiences budget shortfalls that prevent it from adequately maintaining our local road systems, especially during periods of abundant snowfall, so I have little confidence that they will adequately maintain the 40 plus miles to Kake.

**The proposed road link will not “fix” Kake’s economic woes just like the huge timber supply on their private lands failed to assure the same:**

According to your synopsis of the June 23, 2013 Kake Listening Session for the Draft Purpose and Need Statement,

*“...they realized that their population was leaving so they weren’t a sustainable community as they had depleted, their resources were gone, people were leaving, there weren’t jobs and their economy was dropping and they saw that their isolation has caused economic downtown.”<sup>2</sup>*

Indeed, Kake’s precious resources were squandered in short order. The corporate ANCSA business model dictated that in three to four decades their lands, which had sustained them for generations, would be denuded. It was not Kake’s “isolation” that caused the economic downturn, but rather the rapid exploitation of their resources. Potential economic opportunities largely evaporated as a result of unsustainable uses on Kake private lands. So now a road is proposed as the panacea to fix this situation?

I doubt a road to Petersburg will remedy Kake’s woes, nor do I believe more public funds should be squandered on proposals that stand a snowball’s chance of solving anything. There are better ideas to explore to assist Kake residents than throwing a road their way and crossing our

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<sup>2</sup> KFSK. Federal, state officials field questions about Kake road link. June 29, 2013.

collective fingers in some blind hope all will be well when they can drive to Petersburg. I think we all know better.

Despite the fact that the NEPA analysis for the project will only consider access, the real driving force behind the proposed road is for it to parallel a proposed electrical intertie along the same route enabling better access for powerline maintenance. At least some Kake residents have admitted that they support the road only because they think it may be their ticket to less expensive power from the electrical grid. It should be made very clear to Kake residents that the proposed route simply does not guarantee an electrical connection to the grid.

**Petersburg is not suited as a “regional transportation hub”.**

The draft document initially refers to Kake’s potential link to “a regional transportation hub”. The underlying assumption has pointed to Petersburg as the designated hub however this could include any number of central/northern SE communities other than Petersburg. For instance, Wrangell could serve as a hub if the Totem Bay route were preferred. Juneau is a natural hub. Larger communities, that offer greater services, would be better suited to accommodate Kake’s needs for medical, shopping and the other needed services cited in your draft document.

While Petersburg does have daily jet service to Juneau and the lower 48, smaller “shuttle” planes may replace the 737’s currently serving our town. Please verify if this is a serious proposal. Since access to jet service is cited in the P & N Statement, it should be fully evaluated. If jets will be replaced with smaller shuttle service this is reasonably foreseeable and must be considered in your analysis. For instance, is there any real benefit to Kake residents from driving to Petersburg to access shuttle planes (or a jet for that matter), when they could just fly from Kake?

**Following are my responses to various individual assertions made in the Draft Purpose and Need Statement:**

**“Kake residents currently lack timely and affordable access to advanced medical care and facilities as well as a wide variety of essential commercial sales and services to support community well-being.”**

No doubt everyone in smaller communities in SE Alaska believe this to be true, however it is not implicit that Petersburg can adequately meet those needs, since it fails to supply many of the services that even Petersburg residents seek. While I fully support local business, the realities of life in rural Alaska dictate to do without or travel elsewhere to meet our needs.

For instance, our medical center cannot perform surgeries, nor can expectant mothers give birth here, unless the mother happens to deliver prematurely. Petersburg likely experiences per capita a similar rate of medi-vac flights as Kake residents not to mention the temporary translocation of patients to larger communities for needed medical treatment. Petersburg has no ophthalmologist. Visiting vision specialists make regular visits (~ every 2-3 months) to Petersburg, however appointments must be booked weeks in advance. I was unable to secure an appointment recently with the visiting ophthalmologist for a potentially serious eye condition. Instead, I intend to combine my vision appointment with a previously planned trip to Juneau in the near future - as most prudent residents would do. Nor is there a hearing specialist in Petersburg - a need cited by a Kake resident during their listening session. Granted, *some* Kake residents may find medical services in Petersburg meet their needs, but I would be willing to bet the vast majority would not.

Further, there is only one expensive clothing store here, and it generally does not carry children's or baby clothes. One other grocery/department store provides some basic clothing. In contrast, Fred Meyer in Juneau is the go-to, affordable apparel provider for most SE Alaskans when visiting that community.

Our town has quite limited options for car repairs, the incidence of which will likely increase due to driving 40 plus miles on a bumpy, poorly maintained road. Car repair facilities in Petersburg have inadequate ability to diagnose issues arising from malfunctioning electronics found in the newer models. As a result, many Petersburg residents put their cars on the ferry to Juneau for service. And they combine that with a trip to Costco and Home Depot loading their cars to the max with the less expensive goods they find there.

While less expensive than Kake for groceries, Petersburg does not compare to Juneau in most respects. Any assumption that the majority of Kake residents would really prefer to do their shopping or fulfill their medical needs in Petersburg needs serious fact checking. They simply are not going to regularly drive that distance for a loaf of bread and a gallon of milk. Moreover, ridership on a shuttle ferry across the Wrangell Narrows will never cover the cost of operation as the Inter-island Petersburg to Wrangell/Coffman Cove facility demonstrated. And when a medical emergency arises, Kake residents will likely enlist Native health services and air transport rather than drive the distance to Petersburg with an ill patient, especially if they will likely be required to fly to a larger town anyway for treatment. When examined at any depth other than superficial, it is clear that Petersburg cannot fulfill the needs of

Kake residents at a level that justifies construction of a road and ferry crossing to Mitkof Island.

**“The cost of air travel [from Kake] to Juneau and Sitka generally exceeds \$150 each way per person, with potential of added baggage fees. This amount is not affordable for many residents of Kake,... From Juneau, Sitka, and Petersburg, the travelers can board Alaska Airlines to all of the larger communities in Alaska and the lower 48 states.”**

A fare check, two weeks out for airfare on Alaska Airlines from Petersburg to Juneau shows a cost of \$160 each way – more or less depending on the day of travel, so any assumption that Kake residents would choose to drive to Petersburg to catch the one AM northbound flight per day to Juneau, again has no basis in reality. They would have to either overnight in Petersburg, or depart very early from Kake incurring fuel costs for the trip, find a place to leave their car (another expense) and pay a similar or higher fare than they currently do. The same baggage restrictions apply. Any sensible Kake resident would chose to save the time, the fuel and the hassle of driving to Petersburg, and instead fly to directly Juneau to connect with other flights and/or shop and seek medical treatment where goods and services are better. Granted, some Kake residents may find medical services in Petersburg meet their needs, but I would be willing to bet the vast majority would not and again not at a level that justifies construction of a road and ferry crossing to Mitkof Island.

**“The economy of Kake is centered on the area’s fisheries. The nearest major fish processors are in Petersburg. Transporting fish by boat to those processors from the fishing grounds west of Kake is expensive in terms of fuel and time; the time required for boats and personnel to transport fish to Petersburg (approximately 10 hours round trip) decreases the cost-effectiveness of fishing near Kake.”**

Anyone that understands fish processing understands that multiple handling and elevated temperatures are the most significant causes of declines in fish quality and consequently price. My family depends 100% on commercial fishing for our livelihoods and can say unequivocally, that we prefer our fish be transported to the processor in our fishing vessel, or a fishing tender if our capacity is exceeded. This is the most efficient and timely method of transporting fresh fish and maintains quality at its highest level. Fish are suspended in slush ice or refrigerated sea water, maintained at 34 degrees F or so, and generally handled only once prior to reaching the processor.

Compare this to the rigors of multiple loading and off loading from fishing vessels to totes on docks, the time it would take to properly ice



each fish, load on surface vehicles, and then transport on AML sized refrigerated vans along 40 plus miles of poorly maintained roadway. Clearly, this proposal is DOA. A recent two-day seine opening yielded 8 MM salmon. And the 2013 season forecast predicts a 54 MM pink salmon harvest in SE Alaska alone. If fish were offloaded in Kake I shudder to imagine the headache of transporting only a fraction of this volume via a road system. Please give a call to the Icicle fleet manager Randy Lantiegne (907) 772-4294 or Trident Plant Manager Davy Ohmer (907) 772-3333 and they will dispel any myth that transporting fish from Kake to Petersburg along a 40 plus mile stretch of road is a viable option. Combine this with the dozens of fish tender captains and crews that would potentially be displaced and I can conclude without doubt this notion is not viable. Please remove any reference to transport of commercially landed fish along a Kake road link from your P & N Statement.

Kake has a fish plant built during the 1980's. The facility has gone bankrupt twice I believe. Attempts over the years at reigniting the plant to a viable operation have consistently failed.

**“Opportunities for these activities [subsistence] are mostly limited to accessible beaches and logged land adjacent to local logging roads extending out from Kake. Extending the road system out from Kake would expand the area available to subsistence food gathers. There are 120 miles of logging road in the Kake area...”**

As noted in the P & N Statement 120 miles (or .22 miles per person) are available in the area for subsistence purposes. Expanding the road system will not necessarily result in a net benefit to Kake subsistence users. In fact, increased road density is likely to harm the primary subsistence resources of deer and moose due to increased access and competition from other federally qualified subsistence hunters as well as sport and non-resident hunters. Expansion of the existing road system in the project area will create a relatively large area that is easily accessed from local communities. I believe Kake residents are very aware of this possibility.

Subsistence uses are not “limited” to “logged land adjacent to local logging roads” contrary to that assertion in the P & N Statement. Brinkman (2007) surveyed deer hunters on Prince of Wales Island and reported that the median distance that hunters were willing to walk from their vehicles to hunt deer was about 2.4 km (1.5 miles).<sup>3</sup> Moreover,

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<sup>3</sup> Brinkman, T. J. 2007. The Prince of Wales Island deer hunter project: preliminary summary of hunter survey responses. University of Alaska Fairbanks, Fairbanks, AK, USA.

unroaded, old growth forest provides significant if not more subsistence resources than those found along roaded and existing clearcuts and act as reservoirs for old growth dependent species such as Sitka blacktailed deer, wolves goshawks, murrelets and marten.

### **Alexander Archipelago Wolf**

The issue of increased road density is recognized as harmful to wolf populations. The Alexander Archipelago wolf is currently under consideration for listing under the Endangered Species Act as threatened or endangered. A decision could be issued any day. Wolves and deer hunters are closely tied together by their need for deer and ample, high quality habitat to support them. This is recognized in the Forest Plan wolf standard and guideline (TLMP at 4-95) which requires providing, where possible, habitat to support 18 deer per square mile to provide for wolves and hunters as determined by the deer model.

As noted in the formal petition to list the AA wolf: <sup>4</sup>

“Habitat modification through road building directly increases wolf mortality. Although the 1993 AA wolf ESA petition and listing decision focused heavily on logging of old growth habitat and the subsequent reduced carrying capacity for Sitka black-tailed deer, a number of studies have demonstrated that logging on the Tongass NF poses an even more direct and immediate threat to wolves: increased hunting and trapping mortality **fueled by increased road density** [emphasis added]. The combination of decreased habitat for prey and increased hunting and trapping pressure from roads has likely already led to decreases in wolf numbers in parts of Southeast Alaska, especially in GMUs 2 and 3. Numerous studies have concluded that both open and closed roads negatively affect AA wolves in southeast Alaska by increasing access for legal and illegal hunting and trapping (Person et al. 1996, Person and Russell 2008). Studies indicate that total road densities (i.e., open, closed, stored, decommissioned and temporary roads) of 0.7 mi/mi<sup>2</sup> or

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<sup>4</sup> Center for Biological Diversity, Petitioner; Greenpeace, Petitioner. Petition to list the Alexander Archipelago Wolf (*Canis Lupus Ligonii*) as threatened or endangered under the United States Endangered Species Act. August 10, 2011 at p. 43.

more are unsustainable for wolves.<sup>5</sup>”

“...These road densities have already been exceeded in many regions of GMUs 2 and 3, and under the 2008 TLMP, additional road construction will be concentrated in these GMUs. As discussed in section III.E below, a chronic history of failure by the Forest Service to implement road density guidelines on the Tongass NF poses a significant threat to the AA wolf.”

Clearly, any increased road density, whether a logging road or Kake to Kepreanif/Petersburg highway also pose a significant threat to the AA wolf.

### **ANILCA Section 810 Subsistence Evaluation:**

This project has significant subsistence implications regarding abundance and/or distribution, competition and access for subsistence resources. In particular, but not limited to:

- the impact of increased roaded access to subsistence resources in the project area (fish and wildlife in particular).
- the impact of construction of new roads, bridges to subsistence resources.
- destruction and/or alteration of suitable habitat for fish and wildlife species.
- competition between subsistence users of Kake, Kupreanof, Petersburg and Wrangell – all federal recognized subsistence communities.

Please include an analysis on the effects to subsistence resources including but not limited to deer and marten and schedule ANILCA 810 subsistence hearings in all affected communities at the proper time.

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<sup>5</sup> The TLMP wolf standard and guideline includes a range of 0.7 mi/mi<sup>2</sup> to 1.0 mi/mi<sup>2</sup> ; however, scientists who have studied wolves in the region hold to the smaller of those densities. (Pers. comms. Dr. David Person, Person et al. 1996, Person 2006: 18, 20, 21). The 1.0 density that the Forest Service prefers to rely upon comes from wolf studies in Minnesota, where ecological and social factors affect both the legal and illegal take of wolves differently than in Southeast Alaska. “These studies show that wolves generally failed to survive in areas with road densities >0.6 kilometer per square kilometer (0.9 mi/mi<sup>2</sup> ) whereas they persist in similar areas with lower densities of roads.”(Person et al. 1996). Because this suggests a risk of local extinction instead of providing for viability, scientists outside the Forest Service use 0.7 mi/mi<sup>2</sup> , not the range of values used in TLMP.

## **Black Bears**

Please include an analysis of road density impacts and updated information about hunting effort for black bears because the project heightens the risks of increased human-caused mortality. Road construction exacerbates the risk of increased hunter take and vehicle collisions.<sup>6</sup> Also, please consider ADF&G black bear management reports regarding current harvest trends in the project area and illegal take of black bears. Please consult directly with ADF&G biologists who have experience on Kupreanof involving black bears as well as other species.

## **Cumulative Effects, Connected Actions & Segmentation.**

Please do not fail to include a full analysis of the cumulative effects and potential connected actions and segmentation issues of the proposed project. I trust from your comments during the Listening Session that shuttle ferry facilities will be analyzed in this project as part of alternative analysis and the larger project.

Finally,

- Please include an analysis on the effects of the project to any Wild and Scenic Rivers in the study area.
- Please include an analysis on the effects of the project to the Old Growth Reserves (OGR's) strategy in the study area.
- Please include an in-depth analysis of the costs of maintenance of the road and right of way as well as road maintenance and sources of funding to maintain these roads and rights-of-way during all seasons of the year including heavy snow accumulation winters.
- Please disclose any specific upgrades required on publicly owned existing infrastructure on Mitkof Island and beyond including on the Tongass National Forest.

Thank you,

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<sup>6</sup> Audubon TNC Conservation Assessment (Albert and Schoen 2007) Ch. 6.3



 Rebecca Knight

Rebecca Knight  
PO Box 1331  
Petersburg, AK 99833  
bknight15@hotmail.com

also emailed 8/4/2013:

Hello Mike Traffalis

I just submitted comments for this proposed project THEN found the NOI on your website. Should've read it long ago. I was surprised to read that, "This EIS will be coordinated with the Kake to Petersburg Transmission Intertie EIS, which is also in progress."

If this is so, then that sounds like a connected action which leads to segmentation. As you know connected actions should be analyzed in one EIS pursuant to NEPA.

This was not the impression the public has been led to believe. I consider this a MAJOR issue. Further, any "coordination" with the Intertie folks should be disclosed in the EIS.

Have you been "consulting" with the Intertie folks since the NOI was first published?

Please add these comments to the lengthy comments I just previously submitted.

Thank you,

Rebecca Knight

