

**APPENDIX C: AGENCY SCOPING  
COMMENTS**



United States Department of the Interior  
FISH AND WILDLIFE SERVICE  
Juneau Fish & Wildlife Field Office  
3000 Vintage Blvd., Suite 201  
Juneau, Alaska 99801-7100  
(907) 780-1160

July 10, 2008

David C. Miller  
Alaska Division Administrator  
USDOT Federal Highway Administration  
P.O. Box 21648  
Juneau, AK 99802

Re: Gravina Access Project, Ketchikan, Alaska  
Scoping Letter for Supplemental EIS AK-EIS-03-01-F/67698

Dear Mr. Miller:

The U.S. Fish and Wildlife Service has reviewed your invitation to become a cooperating agency with the FWHA in the environmental review process on the Gravina Access Project Supplemental EIS (SEIS), and your formal request for scoping comments on the project.

We respectfully decline your invitation to become a cooperating agency. We will provide comments as a participating agency.

Our scoping comments and concerns remain the same as previously provided during the scoping and review of the previous Draft EIS for the Gravina Access Project. Copies of the following comments are enclosed:

Informal Scoping Meeting Notes, USFWS, ADFG & HDR (prepared by Mark Dalton, HDR, 9/15/1999)

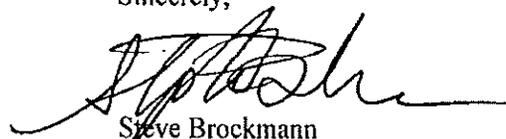
Scoping Comment Letter (10/25/1999), Teresa A. N. Woods (USFWS) to Al Steineger (ADOT&PF)

DEIS Comment Letter (10/6/2003), Willie R. Taylor (USDl) to Reuben Yost (ADOT&PF)

Our comments have focused on the natural biological resources of Gravina and the habitat upon which those resources are dependent. We have expressed concern about the previous Alternative G-2, which would pose serious risks to fish and wildlife resources at the Lewis Reef area. This concern is based upon detailed biological evaluation of this area conducted between 1989 and 1999 in response to proposals for development of this area, and we believe much of that information would benefit this process. That historical and biological information is summarized in a letter from our Field Supervisor in Juneau, Nevin Holmberg, to the Army Corps of Engineers, dated February 26, 1996, a copy of which is enclosed.

If you wish to discuss this project, please contact Bill Hanson at (907) 780-1170.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Brockmann', written in a cursive style.

Steve Brockmann  
Acting Field Supervisor

Cc: ADF&G – Habitat Division, Craig; ADOT&PF Juneau; HDR; NMFS Juneau



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Southeast Alaska Ecological Services  
3000 Vintage Blvd., Suite 201  
Juneau, Alaska 99801-7100

IN REPLY REFER TO:

ALASKA DOT & PF  
SOUTHEAST REGION

OCT 25 1999

PRECONSTRUCTION/DESIGN

Mr. Al Steinger  
Department of Transportation and Public Facilities  
6860 Glacier Highway  
Juneau, AK 99801-7999

Re: Gravina Access Project

Dear Mr. Steinger:

The U.S. Fish and Wildlife Service participated in an informal scoping meeting on the subject project with Mark Dalton of HDR Alaska, Inc., and Jack Gustafson of the Alaska Department of Fish and Game on September 15, 1999 in Ketchikan. Meeting notes summarizing the issues raised were prepared by Mr. Dalton. The meeting notes are a good indication of the range of issues the Service believes should be addressed. A copy is attached for your reference.

Of greatest concern are the cumulative and secondary impacts associated with providing roaded access to Gravina Island. Development should be directed away from the most productive and sensitive habitats, such as the major estuaries and inland habitats at the heads of Bostwick Inlet and Vallenar Bay. Smaller estuaries, such as at Lewis Reef and the head of Blank Inlet, are closer to any potential road crossings between Revilla and Gravina Islands. These areas also support diverse and very high quality fish and wildlife habitats, and should be protected from the secondary and indirect effects of providing access to Gravina Island.

Roads should stay well back from the shoreline, and inland of any obvious beach fringe forest wherever possible. These habitats are particularly important to a broad diversity of fish and wildlife, and are easily and irretrievably damaged by road construction.

The Service is available to assist you with siting facilities, such as a bridge or tunnel, that must be constructed in the near-shore marine environment. We currently maintain a dive program primarily for this purpose. As alternative locations are identified, it is possible that, with adequate funding, the Service could provide underwater evaluations, with an objective of steering development away from the most productive habitats. Please contact the Juneau Fish and Wildlife Office if you are interested in arranging for diving-related assistance.

If fish-bearing streams will be crossed by project-related roads, we recommend that fish passage

be impaired as little as possible. In general, bridges are preferred over culverts. Where culverts are necessary, they must be carefully designed and installed. Several examples of well-designed and well-installed culverts are located along the nearby Revilla Road\Ward Lake Road project recently completed by the Federal Highway Administration. Desirable features of these culverts include adequate bedding, stable aprons at both ends, holding pools at the lower ends of the pipes, baffling on pipes with more than minimal gradient, and careful placement of large and small rocks in a thalweg pattern within the pipes. Similar culverts should be used on fish streams affected by the proposed project.

Thank you for the opportunity to provide early input. If you have any questions, please contact Steve Brockmann at (907) 225-9691.

Sincerely,

  
Teresa A. N. Woods  
Field Supervisor

Attachment: Meeting notes of 9/15/99

cc: ADFG, Ketchikan  
NMFS, Juneau  
FWS, Ketchikan



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, D.C. 20240

ER 03/666

Mr. Reuben Yost  
Special Projects Manager  
Alaska Department of Transportation & Public Facilities  
6860 Glacier Highway  
Juneau, AK 99801-7999

Dear Mr. Yost:

This is in response to the request for the U.S. Department of the Interior's (Department) comments on the Draft Environmental Impact Statement (DEIS) for the Gravina Access Project, Ketchikan Gateway Borough, between Revillagigedo Island and Gravina Island, Alaska. We commend the excellent coordination in project planning between the Alaska Department of Transportation, and local city/borough governments. We offer the following comments for your consideration.

## SECTION 4(F) EVALUATION COMMENTS

The Department of the Interior has no objection to Section 4(f) approval, providing that the Final Environmental Impact Statement evaluates alternatives that potentially minimize harm to Section 4(f) resources. We recommend that a chapter titled "Section 4(f) Evaluation" be placed in the body of the Final Environmental Impact Statement. Missing from the DEIS is a Section 4(f) evaluation that includes statutory mandates, maps depicting Section 4(f) properties and resources. The close proximity of the project to public recreational lands, numerous historic and archeological properties within the study area provides the opportunity for potential impacts to Section 4 (f) resources. ①

## ENVIRONMENTAL STATEMENT COMMENTS

The DEIS evaluates alternatives to improve surface transportation between Revillagigedo (Revilla) and Gravina Islands in Ketchikan. Six potential bridge configurations and three potential ferry service options are considered. The preferred alternative (F1) would use two bridges, one between Revilla and Pennock Islands, and a second between Pennock and Gravina Islands.

The DEIS does a good job identifying potential impacts of each of the alternatives considered, with one exception. To improve the accuracy and completeness of the Final Environmental Impact Statement, the U.S. Fish and Wildlife Service recommends that you include an analysis of the important and productive habitat near Lewis Reef, which would be impacted by the selection of Alternative G-2 (construction of a ferry terminal at that site). A diverse mix of habitat types in this small area provides food and ②

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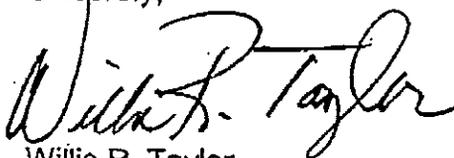
shelter for a wide variety of fish and wildlife. Several species of salmon, herring, Sitka black-tailed deer, Canada geese, bald eagles, and black bear are among the species that make seasonal use of the diverse habitats occurring there. If the final decision elects to construct such a transportation hub, rather than a bridge, on Gravina Island, we recommend that alternative locations be given preference, in order to avoid such impacts.

③

As the Department has a continuing interest in the project, we are willing to cooperate and coordinate with you on a technical assistance basis in further project evaluation and assessment. Mr. Bruce Halstead, Field Supervisor, Juneau Fish and Wildlife Field Office, at (907) 586-7020 may be consulted about fish and wildlife resources. If you have questions regarding Section 4(f) resources, contact Joan Darnell, National Park Service, Environmental Resources Team Manager, telephone (907) 644-3526.

We appreciate the opportunity to provide these comments.

Sincerely,



Willie R. Taylor  
Director, Office of Environmental Policy  
and Compliance

# Meeting Notes



Subject Gravina Access Project	Sheet 1 of 2
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Project Number 07072-144-249	File Number
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Meeting Date 9-15-99	Meeting Location Ketchikan
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Notes by Mark Dalton	Office
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Attendees	Jack Gustafson, ADF&G	Steve Brockmann, USFWS	Robin Reich, HDR
Mark Dalton, HDR			

Topics Discussed	Action/Notes
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Purpose of meeting was to brief Ketchikan ADF&G and USFWS staff on Gravina Access Project and discuss the scope of various issues that, on an initial review, are pertinent to the project. The meeting was in no way an exhaustive review of the issues of concern to these two agencies. An opportunity to provide formal scoping comments will be afforded.

Issues raised are in no particular order.

1. Salmon streams – any potential crossings should be designed to protect fish habitat and passage.
2. Dusey Canada geese – known to occur, often in Lewis Reef area.
3. Herring – they spawn in various locations, which change from year to year.
4. Sea lions occur, often following herring.
5. Orcas are occasionally seen in Tongass Narrows.
6. Locations of marine mammals may need to be studied.
7. Bald eagle nests – Mike Jacobsen in Juneau is contact – FWS conducted a nest survey on south Gravina as a control for monitoring bald eagle nests on Annette in vicinity of Walden Point Road.
8. Gravina salamander subspecies – slender salamander – may warrant spring collection effort to determine status and distribution.
9. Comment about avoiding Fens vs. Bogs – Fens are perceived as having a higher value (more productive, less acidic, more sedges and grasses, more groundwater influenced).
10. Waterfront land development – comment made to spare the beach fringe area, up to approximately 1,000' back from shoreline, which could serve as deer winter range. Agency concern is greater where shoreline is relatively low angled. Steeper, more abrupt (cliff-like) shoreline is better suited for waterfront development. Issue of water – dependent uses vs. non-water dependent.
11. Stormwater runoff – beach fringe and stream buffer areas are important for runoff filtration.
12. Access to borough and other lands near Lewis Reef has been a serious concern of agencies – access to Lewis Reef should be limited to preserve ecological value.



# Meeting Notes



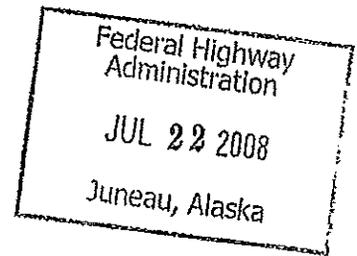
13. All areas along coast of Gravina with low gradient intertidal shallows and adjacent grass/sedge meadows are higher value, especially at mouths of streams.
14. Some timber on Gravina – south is very low volume. Much is 16,000 bd. ft. per acre, considered by Forest Service as non-commercial forest.
15. Refuge Cove – relatively sterile area adjacent to Ward Cove – islands go dry – possible crossing location but considerable private property.
16. Shoreline habitat typing in areas under consideration for access alternatives should be studied.
17. Lewis Reef – best piece of habitat in Tongass Narrows.
18. There are shipwrecks in area including the vessel *Ocean Pacific*, located near USCG station.
19. Personal use of sport fish in area, such as shrimp and crab. Some commercial fishing in area for halibut and baitfish.
20. Kelp bed located at south end of Pennock.
21. Birds – recent bird surveys conducted by USFWS in project area- contact Brad Andres for more information.
22. Deer populations use the forest/beach fringe for cover and as a migration corridor and feed on the beach. Wolf populations may be dependent of deer.
23. Locations of old growth and old growth dependant species may need to be considered.
24. Review previous Foster Wheeler work.



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
U.S. ARMY ENGINEER DISTRICT, ALASKA  
REGULATORY DIVISION  
P.O. BOX 6898  
ELMENDORF AFB, ALASKA 99506-0898

JUL 17 2008



Regulatory Division  
POA-2000-152

Mr. David C. Miller  
Division Administrator  
U.S. Department of Transportation  
Federal Highway Administration  
709 West 9<sup>th</sup> Street, Rm. 851  
Post Office Box 21648  
Juneau, Alaska 99802

Dear Mr. Miller:

We have received your July 1, 2008, letter, regarding the initiation by the Federal Highway Administration (FHWA), in cooperation with the Alaska Department of Transportation and Public Facilities (ADOT&PF), for the Supplemental Environmental Impact Statement (SEIS) for the proposed Gravina Access Project near Ketchikan, Alaska.

The U.S. Army Corps of Engineers (Corps) appreciates and accepts the opportunity to become a cooperating agency with the FHWA in the environmental review process for the Gravina Access Project. In addition, we are providing our input on the purpose and need, the range of alternatives to be considered, and field work considerations.

#### Purpose and Need

FHWA and ADOT&PF's stated purpose and need for this project has remained the same, as stated in the Final EIS for this project.

The Corps of Engineers' (Corps) scope of review is primarily defined by its jurisdiction under Section 404 of the Clean Water Act [33 U.S.C. 1344] and Section 10 of the Rivers and Harbor Act [33 U.S.C. 403].

Section 10 of the Rivers and Harbors Act of 1899 applies to the construction of any structure in, under, or over any navigable water of the United States, the excavating from or depositing of material in such waters, or the accomplishment of any other work affecting the course, location, condition, or capacity of such waters. The substantive evaluation criteria for this authority is the Corps' public interest review [33 Code of Federal Regulations (CFR) Part 320.4(a)] and National Environmental Policy Act (NEPA). Placement of fill for the bridge abutments is regulated under Section 10 of the Rivers and Harbor Act if fill is located below mean high water.

Section 404 applies to the discharge of dredged or fill material into waters of the United States at specified disposal sites. The substantive evaluation requirements of Section 404 of the Clean Water Act are guidelines developed by the Administrator of the Environmental Protection Agency (EPA) in conjunction with the Secretary of the Army, and are published in 40 CFR 230, "Guidelines for Specification of Disposal Sites for Dredged or Fill Material" (hereafter referred to as the Section 404(b)(1) Guidelines, or the Guidelines). Proposed activities in waters of the U.S., including wetlands, subject to

Section 404 are the placement of fill for road construction and bridge abutments, placement of fill for temporary staging areas and construction roads, and land clearing, if the land clearing activity results in more than an incidental discharge of fill material. Under the Guidelines, defining the purpose of a project involves two determinations; the basic project purpose, and the overall project purpose. The definition of basic project purpose is used to determine if the activity associated with the proposed placement of fill material is "water dependent" [40 CFR 230.10(a)(3)]. Where the activity associated with the placement of fill material in a special aquatic site (in this instance wetlands) does not require access or proximity to or siting within the wetland in order to fulfill its basic purpose (e.g. the activity is not water dependent) the Guidelines pose two rebuttable presumptions: (1) practicable alternatives not involving wetlands are presumed to be available, and, (2) practicable alternatives not involving discharges to wetlands are presumed to have less adverse impact on the aquatic ecosystem. For non-water dependent projects it is the applicant's responsibility to clearly and convincingly rebut the two presumptions.

As discussed in the Corps' regulations at 33 CFR 325, Appendix B, the underlying purpose and need for the activity from the public interest perspective needs to be stated. Therefore, at this point the broad public purpose is to provide improved (more convenient and cost-effective) access to Gravina Island, and to improve the reliability of access to Ketchikan International Airport for passengers, airport tenants, emergency personnel and equipment, and shipment of freight, and provide for economic development of the Ketchikan Borough. The SEIS needs to identify if the original assumptions for economic development within the Ketchikan Borough are the same or if they have changed.

The definition of overall project purpose is used in the determination of practicable alternatives since the Guidelines define practicable to mean: "available and capable of being done after taking into consideration cost, existing technology, and logistics in light of the overall project purposes" [40 CFR 230.3(q)]. While the definition of overall project purpose is the Corps' responsibility, it must take into consideration the applicant's stated purpose for the project (October 15, 1999, Army Corps of Engineers Standard Operating Procedures for the Regulatory Program). It cannot be so restrictive that the applicant's proposal is the only possible alternative or so broad that it makes the search for alternatives meaningless. After considering the applicant's stated project purpose we defined the overall project purpose in our first decision as: "To provide improved (more convenient and cost-effective) access to Gravina Island, and to improve the reliability of access to Ketchikan International Airport for passengers, airport tenants, emergency personnel and equipment, and shipment of freight and provide for economic development of the Ketchikan Borough."

The preferred alternative identified by the lead Federal agency for NEPA purposes may not be the least environmentally damaging preferred alternative (LEDPA) pursuant to the Clean Water Act. The Guidelines dictate that the Corps authorize the LEDPA [40 CFR 230.10 and 230.12(a)(3)(i)].

#### Alternatives

For all of the proposed alternatives, it is imperative the following information is provided:

1. Field verification of the original wetland delineation and submittal to our office for concurrence.
2. The SEIS should document how any new preferred alternative includes the Gravina Island Highway that has been constructed and is part of the permitted Alternative F1.

Field Work Considerations

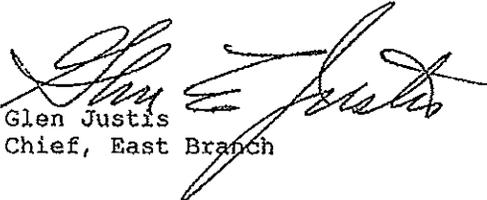
1. Field work should be done in accordance with the Corps 1987 Wetland Delineation Manual and the September 2007 Alaska Regional Supplement.
2. All streams, drainages, and creeks should be identified for all alternatives.

Additional Information

In accordance with 33 CFR Part 325.1(d)(7), "For activities involving discharges of dredged or fill material into waters of the U.S., the application must include a statement describing how impacts to waters of the United States are to be avoided and minimized. The application must also include either a statement describing how impacts to waters of the United States are to be compensated for or a statement explaining why compensatory mitigation should not be required for the proposed impacts." Therefore, it is important to keep in mind the SEIS should address all measures to avoid, minimize, and the compensatory mitigation considered for fill impacts associated with the alternatives. Additional information can be obtained from the Alaska District's *Final Mitigation Rule* Public Notice, No. POA-2008-834, which is available for viewing on our website:  
<http://www.poa.usace.army.mil/reg/SPNNew.htm>.

You may contact Ms. Nicole Hayes of my staff, by phone at (907) 753-2792, toll free from within Alaska at (800) 478-2712, by mail at the address above, or via email at [nicole.m.hayes@usace.army.mil](mailto:nicole.m.hayes@usace.army.mil), if you have any questions.

Sincerely,

  
Glen Justis  
Chief, East Branch

**Holman, Deborah L (DOT)**

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**From:** Yost, Reuben M (DOT)  
**Sent:** Friday, July 18, 2008 2:05 PM  
**To:** Holman, Deborah L (DOT)  
**Cc:** Maines, Kristen  
**Subject:** FW: Div of Forestry participation

fyi

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**From:** Slenkamp, Paul E (DNR)  
**Sent:** Thursday, July 17, 2008 5:05 PM  
**To:** Yost, Reuben M (DOT)  
**Subject:** Div of Forestry participation

Mr. Yost,

The Division of Forestry (DOF) appreciates and accepts your invitation to be a participating agency in the Gravina Access Project Supplemental Environmental Impact Statement. My understanding is that the previous Area Forester, Mike Curran, was involved with the Initial review. The DOF interest is primarily that of fielding questions and concerns regarding our harvest and access operations on Gravina Island. I look forward to working with you and would you please advise me when our input is requested. I will be the primary contact person for DOF.

Thank You,

Paul Slenkamp

Southern Southeast Area Forester

7/18/2008



City Manager  
334 Front Street  
Ketchikan, AK. 99901

Phone (907) 228-5603  
Fax (907) 225-5075

July 18, 2008

Mr. Malcolm A. Menzies, P.E., L.S.  
Southeast Regional Director  
Alaska Department of Transportation & Public Facilities  
PO Box 112506  
Juneau, Alaska 99811-2506

Dear Director Menzies:

**Re: Invitation To Become A Participating Agency And Request For Scoping Comments – Gravina Access Project Supplemental Environmental Impact Statement (SEIS), FHWA-AK-EIS-03-01-F/67698**

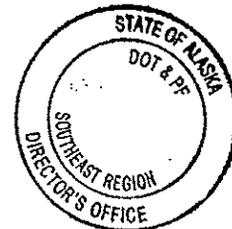
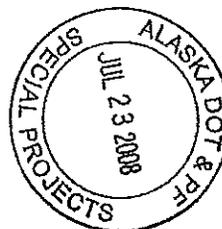
With regard to the above referenced subject, please be advised that at its meeting of July 17, 2008 the City Council adopted a motion directing my office to advise the Department of Transportation and Public Facilities of the City of Ketchikan's intent to become a participating agency in the environmental review process for the Gravina Access Project. Although the City is not submitting official scoping comments at this time, the City Council is reserving its right to do so prior to the August 19, 2008 deadline for the Scoping Summary Report and throughout the duration of the project.

Should you have any questions on this matter, please do not hesitate to contact me.

Very truly yours,

Karl R. Amylon  
City Manager

cc: Mayor and City Councilmembers  
Katy Suiter, City Clerk  
David Martin, Assistant City Manager  
Harvey Hansen, Public Works Director  
Christopher Brewton, Electric Division Manager  
Van Abbott, Telecommunications Division Manager  
John Kleinegger, Water Division Manager  
Dan Bockhorst, Borough Manager





# KETCHIKAN GATEWAY BOROUGH

344 FRONT STREET • KETCHIKAN, ALASKA 99901

• 907/228-6625 • fax 907/247-6625

OFFICE OF THE BOROUGH MANAGER

July 23, 2008

Mr. Malcolm A. Menzies, P.E., L.S.  
Southeast Regional Director  
Alaska Department of Transportation & Public Facilities  
P.O. Box 112506  
Juneau, AK 99811-2506

**Re: Invitation to Become a Participating Agency:  
Supplemental Environmental Impact Statement & Request for Scoping Comments  
Gravina Access Project FHWA-AK-EIS-03-01-F/67698**

Dear Mr. Menzies,

Thank you for addressing the Mayor and Assembly at the Borough Assembly meeting on July 21, 2008. The Mayor and Assembly have accepted your invitation for the Ketchikan Gateway Borough to become a participating agency in the Gravina Access Project referenced above.

As you heard during the Assembly meeting, in the event some form of enhanced ferry service is designated as the preferred alternative in the Record of Decision following the preparation of the Final Supplemental Environmental Impact Statement, there is a strong desire among elected officials of the Ketchikan Gateway Borough in having all airport ferry service provided without charge (or at least at fares *significantly* less than the current fares). That position reflects three fundamental concerns.

The first is a matter of broad public policy. Ketchikan is the only community in Alaska whose residents must pay a fare to travel to and from the airport. Throughout Alaska, but particularly in communities including Ketchikan that lack highway connections elsewhere, air transportation is an essential service. As a matter of public policy, local residents and businesses should not be charged to gain access to the airport.

The second primary concern, as was stressed during the meeting of July 21, is that operation of the existing airport ferry system already imposes a substantial financial drain on our community – nearly \$1.7 million annually. For a community of 5,400 households,<sup>1</sup> that is equivalent to an annual cost of \$315 annually per household just to

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<sup>1</sup> The U.S. Census Bureau reports that there were 14,070 residents in 5,399 occupied housing units in the Ketchikan Gateway Borough during the most recent federal decennial census. The average number of residents per occupied housing unit in the Borough at the time of that census was 2.6. The Alaska Department of Labor projects that the July 2007 population of the Ketchikan Gateway Borough is 13,160. If the current number of residents per household is the same that which was reported at the time of the last federal decennial census, the number of currently occupied households in Ketchikan would be 5,062. The fiscal burden of operating the ferry would then be and the cost per household

gain access to the airport.

The cost of operating the present ferry system, particularly the high cost of fuel, is a major concern to the Borough. Moreover, maintenance costs, especially those required to sustain the annual Certificate of Inspection by US Coast Guard, are substantial.

With the existing high fares, the Borough's ferry operation is projected to break even during the current year. However, that is only because of an unusually high number of users due to extensive construction work on Gravina Island. That circumstance has greatly increased the revenue from ferry operations. However, when that construction work ceases in the near future, revenues will decline by a margin far greater than costs. The already-high fares will no longer cover the cost of operations.

Please keep in mind that ferry-system fares represent only a tiny fraction of the substantial fiscal burden imposed on local citizens and businesses by local governments in Ketchikan. Currently, that burden includes:

\$22,420,023 in taxes levied by the Ketchikan Gateway Borough, the majority of which pays for unfunded mandates and penalties imposed upon the Ketchikan Gateway Borough by the State of Alaska.<sup>2</sup>

\$ 7,489,429 in charges and fees for service imposed by the Ketchikan Gateway Borough. These include charges such as \$750,000 in airport

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would be even higher.

<sup>2</sup> Forty-five years ago, the Alaska Legislature mandated the creation of the Ketchikan Gateway Borough. To defuse the contentious nature of that action (i.e., imposition of a form of local government having significant duties on selected Alaskans without the consent of those affected), the Alaska Legislature offered the following promise in Section 1 of the bill:

**No area incorporated as an organized borough shall be deprived of state services, revenues, or assistance or be otherwise penalized because of incorporation.**

Governor Egan signed the legislation into law and thereby joined the Alaska State Legislature in promising that organized boroughs would not be deprived of state services, revenues, or assistance, and that boroughs would not be otherwise penalized by the State of Alaska. Regrettably, the 1963 promise by the legislative and executive branches of the State of Alaska was breached in a serious manner more than two decades ago. The greatest impact is felt with respect to funding for public education – a constitutional duty of the State of Alaska that has been delegated to borough governments in those parts of Alaska where boroughs exist. In the current fiscal year alone, the Ketchikan Gateway Borough will be deprived of nearly \$9.5 million in State funding for schools compared to what it would receive had the 1963 promise been upheld. Other mandates applied to the Ketchikan Gateway Borough will add nearly \$2.3 million in additional burdens during the current fiscal year (see enclosure for details). For a community of 13,160 residents, the fiscal impact of the penalties and unfunded mandates is enormous.

Mr. Malcolm A. Menzies, P.E., L.S.  
July 23, 2008  
Page 3

landing fees (such fees are not imposed on airports operated by the State of Alaska), which reportedly make the Ketchikan International Airport one of the more expensive airports in Alaska for air carriers.

\$14,210,799 in taxes levied by the City of Ketchikan.

\$19,739,150 in charges and fees imposed by the City of Ketchikan.<sup>3</sup>

The figures above total \$63,859,401, which is equivalent to \$11,826 per household.

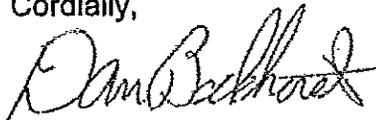
The third essential issue recognizes that a ferry link has the highest average annual operation and maintenance (O&M) cost of any Gravina Access alternative (except for the "no action" alternative). According to the *Gravina Action Project EIS* (p. 2-3), the O&M costs of the ferry alternatives were projected to be 31 to 45 times greater than the O&M costs of the bridge alternatives. The O&M costs of the ferry alternatives were also nearly 2.5 times the cost of the existing ferry service.

There is great concern locally that the current onerous burden of operating the ferry system would become untenable with "improved" ferry service. Accordingly, any ferry alternative that does not include a dedicated fund or endowment to cover operating costs may not be a viable alternative.

If you would like further information or clarification concerning the issues addressed here, please contact me.

The Borough looks forward to working with your agency in the preparation of the Supplemental Environmental Impact Statement concerning improved access to Gravina Island.

Cordially,



Dan Bockhorst  
Borough Manager

cc: Mayor and Assembly Members, Ketchikan Gateway Borough  
Karl Amylon, City Manager, City of Ketchikan

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<sup>3</sup> The figure above does not include \$43.6 million in charges by the Ketchikan Public Utilities operated by the City of Ketchikan.



U. S. Department  
of Transportation

Federal Aviation  
Administration

Office of the Regional Administrator  
Alaskan Region

222 W. Avenue 7<sup>th</sup> #14  
Anchorage, Alaska  
99513-7587  
(907) 271-5645 Phone  
(907) 271-5113 Fax

JUL 24 2008

Mr. David C. Miller  
Division Administrator, Alaska Division  
Federal Highway Administration  
P.O. Box 21648  
Juneau, AK 99802

Dear Mr. Miller:

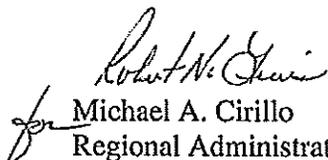
Thank you for your letter dated July 1, 2008, addressed to Ms. Pat Oien, of our Airports Division in regards to the Gravina Access Project near Ketchikan and a proposed Supplemental Environmental Impact Statement. Your letter requests that the Federal Aviation Administration (FAA) act as a participating agency to assist in analysis of the environmental consequences of various alternatives. Primarily the FAA's role would be solely to assist in those matters within the subject matter expertise of our agency and areas where Congress has delegated certain responsibilities.

We are pleased to take on this role, both from a standpoint of regulatory responsibility and to assist a sister agency within the modal Department of Transportation. Further, we recognize it is in the greater public interest to complete an effective evaluation of alternatives and to the extent we can assist by our involvement as a participating agency, we will commit to provide the best support to your efforts within the bounds of statutory limitations and funding.

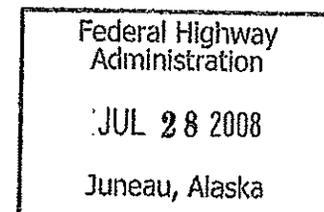
Because it is possible that several components of our agency might lend expertise and comments, we ask that you designate the undersigned as the principal point of contact for any matters you may have during the initial scoping and comment period. Depending on the results of that process, we may then re-designate the principal contact within our agency to facilitate more effective involvement and communications.

As always please do not hesitate to contact us if there are any questions or concerns.

Sincerely,

  
Michael A. Cirillo  
Regional Administrator

cc: Pat Oien, Airports Division





United States  
Department of  
Agriculture

Forest  
Service

Alaska Region

P.O. Box 21628  
Juneau, AK 99802-1628

File Code: 7710

Date: JUL 29 2008

David C. Miller  
Division Administrator, Alaska Division  
U.S. Department of Transportation  
Federal Highway Administration  
P.O. Box 21648  
Juneau, AK 99801

Dear Mr. Miller:

Thank you for the invitation to participate in the Supplemental Environmental Impact Statement (SEIS) for the Gravina Access Project. Having reviewed the project proposal and its relationship to National Forest land management, I am declining your invitation to be a participating agency. The USDA Forest Service has no jurisdiction or authority with respect to this project, has no expertise or information relevant to the project, and does not intend to submit comments on the project.

As always we are available to provide informal consultation and assistance to the Alaska Division. Please contact Bob Goetz, Acting Regional Transportation Engineer, at 907-586-8761 or Jack Oien, Tongass National Forest's Road Program Manager, at 907-228-6331 if you have questions.

Sincerely,

DENNIS E. BSCHOR  
Regional Forester

cc: Forrest Cole, Sam Carlson, Larry Dunham, Jack K Oien, Robert Goetz



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

July 31, 2008

Reply to  
Attn of: ETPA-088

RE: 08-047-FHW

Mr. David Miller, Division Administrator  
Federal Highway Administration  
709 West 9<sup>th</sup> Street, Rm. 85  
P.O. Box 21648  
Juneau, Alaska, 99802

Dear Mr. Miller:

Thank you for extending an invitation to the EPA, Region 10, to participate as a National Environmental Policy Act (NEPA) cooperating agency for the Gravina Access project in Ketchikan, Alaska. EPA declines to participate as a formal cooperating agency, however we would like to participate as our resources allow. As such, we intend to provide Scoping comments in response to the July 7, 2008, *Federal Register* Notice of Intent to prepare a Supplemental Environmental Impact Statement (SEIS). Our goal is to remain actively involved regarding these and other aspects of the proposed project.

For EPA, participation as a formal cooperating agency usually requires a signed agreement between our agencies, and generally commands a high priority and commitment of Region program staff resources that is above and beyond early and routine involvement. While we ask to remain informed and involved with project developments, we do not believe this level of commitment requires a formal signed agreement or an unusual expenditure of resources. We would like to be actively engaged as a participating agency, pursuant to Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users. Therefore, we accept designation as a participating agency, and we intend to continue our participation in project meetings and discussions, including the Section 404 permitting process.

As a participating agency, we would appreciate opportunities to participate in meetings, site visits, and document reviews as appropriate. We particularly appreciate involvement opportunities during transportation planning stages prior to preparation of the NEPA document, as well as during early project development and stages of NEPA document preparation. These early stages provide significant opportunities to identify important resource issues and to achieve maximum avoidance of environmental impacts. During preparation of the EIS, key points in time for our participation may include, but are not limited to, scoping, development of project purpose and need, creation of criteria for alternatives selection, generation and analysis of the range of alternatives, selection of a preferred alternative, and mitigation.

Please contact Jennifer Curtis of my staff at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) to discuss EPA participation. We look forward to continuing our work with Federal Highway Administration and Alaska Department of Transportation and Public Facilities on this project.

Sincerely,

Christine Reichgott, Manager  
NEPA Review Unit

Cc: Michael Vanderhoof, Environmental Coordinator, FHWA

Federal Highway  
Administration

AUG 05 2008

Juneau, Alaska



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

August 19, 2008

Reply to  
Attn of: ETPA-088

RE: 08-047-FHW

Mr. Michael Vanderhoof, Environmental Coordinator  
Federal Highway Administration  
P.O. Box 21648  
Juneau, Alaska 99802

Dear Mr. Vanderhoof:

The U.S. Environmental Protection Agency (EPA) has received the **Notice of Intent (NOI) to prepare Supplemental Environmental Impact Statement (SEIS) for the Gravina Access Project in the Ketchikan Gateway Borough, Ketchikan, Alaska**. We are submitting scoping comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs EPA to review and comment in writing on environmental impacts associated with all major federal actions. Our review of the EIS prepared for the proposed project will consider not only the expected environmental impacts of the project, but also the adequacy of the EIS in meeting the public disclosure requirements of NEPA. We have enclosed a copy of *EPA's Section 309 Review: The Clean Air Act and NEPA* which provides further elaboration of our EIS review responsibilities (Enclosure 2).

On July 31, 2008, EPA responded to the Federal Highway Administration's (FHWA) invitation to become a participating agency on this project. We look forward to working with FHWA and the Alaska Department of Transportation and Public Facilities (ADOT&PF) in this capacity, as well as to receiving and reviewing the coordination plan that is being developed under the direction of the Safe, Accountable, Flexible and Efficient Transportation Act: A legacy for Users (SAFETEA-LU). Our comments are also in response to our role as a participating agency.

According to the NOI, the purpose of this project is to examine ways to connect Revillagiedo Island, and the communities of Ketchikan and Saxman, to Gravina Island, and the Ketchikan International Airport, and adjoining lands that offer recreational and development potential. Currently, a ferry across Tongass Narrows provides the only regular access to Gravina Island. The need for improving access is threefold: to provide the Ketchikan Gateway Borough and its residents more reliable, efficient, convenient, and cost-effective access for vehicles, bicycles, and pedestrians to lands on Gravina Island in support of the Borough's adopted land use plans; to improve the convenience and reliability of access to Ketchikan International Airport for passengers, airport tenants, emergency personnel and equipment, and shipment of freight; and to promote environmentally sound, planned long-term economic development on Gravina Island.

As background, the FHWA issued a Record of Decision on September 15, 2004, which identified Alternative F1 Bridges (200-foot high East and 120-foot high West) Between South Tongass Avenue and the Airport, via Pennock Island as the Selected Alternative. In 2006 ADOT&PF proceeded with the first phase of Alternative F1--construction of the Gravina Island Highway segment, which extends from the Ketchikan International Airport south approximately 3 miles to the proposed bridge spanning the west channel of Tongass Narrows. This is expected to be completed in 2008. On September 21, 2007, due to rapidly escalating costs, Alaska Governor Sarah Palin directed the ADOT&PF to look for a lower cost alternative for access to Gravina Island instead of proceeding further with Alternative F1. As such, the ADOT&PF plans re-examine alternatives and identify and select a new preferred alternative. FHWA informed the ADOT&PF that if the Gravina Island Highway segment was not incorporated into any new preferred alternative that segment may be determined ineligible for federal aid. Most of the reasonable alternatives evaluated in the FEIS did not include the Gravina Island Highway. An SEIS is being prepared to consider the impacts of the Gravina Island Highway in the analysis of reasonable alternatives, to address the reduced funding levels available, and to identify a new preferred alternative.

The Gravina Access Project SEIS will build on the studies completed and previously approved by FHWA to identify a lower cost alternative for access to Gravina Island. The SEIS will examine several alternatives which may include: three ferry alternatives--one located north of the airport, one located near the existing ferry, and one located south of the airport; two 200-foot high bridge crossings located near the airport; two 120-foot high bridge crossings located near the airport; a bridge alternative that crosses Pennock Island with a 200-foot high bridge from Revilla Island to Pennock Island and a 120-foot high bridge from Pennock Island to Gravina Island; and a bridge alternative that crosses Pennock Island with a 60-foot high bridge from Revilla Island to Pennock Island and a 200-foot high bridge from Pennock Island to Gravina Island. The alternatives to be studied in detail in the SEIS will be determined by a screening process after scoping is complete and any new alternatives are identified. The No Action Alternative will remain under consideration throughout the SEIS process.

EPA commends the effort of FHWA to develop an SEIS to evaluate additional alternatives to link Gravina Island and Revillagigege Island. We believe a supplemental document is the appropriate level of analysis given the potential impacts from various alternatives that have been identified in the NOI. We also believe that the analysis of the impacts of the highway segment, although post construction, is appropriate given the potential relationship of that action to various bridge alignments. In addition to the scoping comments previously submitted by our agency on this project, we request that you also consider the enclosed comments (see Attachment 1). We offer the detailed scoping comments to inform FHWA of issues that EPA believes should be considered as the NEPA process for the SEIS moves forward.

Thank you for the opportunity to provide comments on the NOI. Please feel free to contact me at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) if you have questions or would like additional information regarding these comments.

Sincerely,

/s/

Jennifer J. Curtis, NEPA Reviewer  
NEPA Review Unit

Cc: Reuben Yost, Project Environmental Coordinator, ADOT&PF

Enclosures

## ENCLOSURE 1

## EPA DETAILED COMMENTS ON FHWA GRAVINA ACCESS SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

**Air Toxics**

There is heightened concern for human health from projects that result in air toxics emissions and particulate matter from mobile sources, particularly diesel exhaust. The *National Air Toxics Assessment*, <http://www.epa.gov/ttn/atw/nata>, asserts that a large number of human epidemiology studies show increased lung cancer associated with diesel exhaust and significant potential for non-cancer health effects. Also, the Control of Emissions of Hazardous Air Pollutants from Mobile Sources Final Rule (66 FR 17230, March 29, 2001) lists 21 compounds emitted from motor vehicles that are known or suspect to cause cancer or other serious health effects.

EPA strongly recommends that the SEIS disclose whether vehicular air toxics emissions would result from project construction and operations, discuss the cancer and non-cancer health effects associated with air toxics and diesel particulate matter, and identify sensitive receptor populations and individuals that are likely to be exposed to these emissions.

For each alternative, EPA recommends:

- Disclosure of all locations at which emissions would increase near sensitive receptors because of project construction, intersections, increased traffic, including increased diesel traffic, increased loads on engines (higher speeds, climbs, etc.).
- An assessment or accounting (qualitative or modeled depending on the severity of existing and projected conditions) of all the factors that could influence the degree of adverse impact on the population because of the activities listed above (e.g., distances to human activity centers and sensitive receptor locations, particularly parks, schools, hospitals, day care centers, outdoor recreation facilities, etc; amount, duration, and location of emissions from construction, diesel, and other vehicles, etc.)
- For receptor locations, we recommend that hotspot analysis be conducted for air toxics and particulate matter, and that construction mitigation measures be included. We have enclosed two lists of potential mitigation measures that could reduce emissions during construction (Enclosure 1).

We also ask that construction mitigation measures to reduce emissions during project construction be included. We have attached two lists of recommended measures for your consideration and use. For more information about mitigation measures, conformity requirements, and air toxics, please contact our Air Program office at 206-553-2770.

**Aquatic Resources**

The SEIS should describe aquatic habitats in the affected environment (e.g., habitat type, plant and animal species, functional values, and integrity) and the environmental consequences of the proposed alternatives on these resources. Impacts to aquatic resources should be evaluated in terms of the aerial (acreage) or linear extent to be impacted and by the functions they perform.

The proposed activities may require a Clean Water Act Section 404 permit from the Army Corps of Engineers (Corps). For wetlands and other special aquatic sites, the Section 404(b) (1) guidelines establish a presumption that upland alternatives are available for non-water dependent activities. The 404(b) (1) guidelines require that impacts to aquatic resources be (1) avoided, (2) minimized, and (3) mitigated, in that sequence. The SEIS should discuss in detail how planning efforts (and alternative selection) conform with Section 404(b) (1) guidelines sequencing and criteria. In other words, FHWA must show that they have avoided impacts to wetlands and other special aquatic sites to the maximum extent practicable. The SEIS should discuss alternatives that would avoid wetlands and aquatic resource impacts from fill placement, water impoundment, construction, and other activities before proceeding to minimization/mitigation measures.

We also recommend that the short and long term impacts of both pile driving and intertidal fill be analyzed, including the full evaluation of the potential impacts on the upstream aquatic resources, system dynamics, and aquatic biota.

### **Ecological Connectivity**

Roads and bridges can create linear barriers in the landscape, thereby resulting in habitat fragmentation. The SEIS should analyze and disclose the extent to which the various alternatives bisect and fragment wildlife habitat and movement routes. It will be important to include means to make roadways permeable to wildlife movements, such as, by providing wildlife crossing structures of appropriate number, size, and locations to adequately accommodate wildlife movement. These mitigation measures prevent vehicular-wildlife collisions, which is important for both human and wildlife safety.

Ecological connectivity is a broader concept, however, than wildlife movement in the landscape. It includes the connections and interactions between land and water, the transfer of water, wood, soil, nutrients, genes, species, and so on. For example, ecological connectivity is impaired when a stream is channelized and separated from its floodplain; when shoreline structures or bank armoring block sediment flows and shoreline enrichment processes; when dams are built or culvert installation block fish passage; when wetland fills or impervious surface prevent ground water aquifer recharge; when hillslope cuts breach seepage areas, springs, or underground aquifers; when aquatic habitat hydrological alterations and development interfere with surface water/ground water interactions and riverine hyporheic zones; and so on. Environmental impact assessments need to focus much more on identifying these connections and the consequences of severing them; project design should incorporate the means to preserve them.

### **Water Quality**

Water quality degradation is one of EPA's primary concerns. Section 303(d) of the Clean Water Act (CWA) requires the State of Alaska to identify waterbodies that do not meet water quality standards and to develop water quality restoration plans to meet established water quality criteria and associated beneficial uses. The SEIS should disclose which waters may be impacted, the nature of potential impacts, and specific pollutants likely to impact those waters. It should also report those waterbodies potentially affected by the project that are listed on the State's most current EPA-approved 303(d) lists. The SEIS document should describe existing

restoration and enhancement efforts for those waters, how the project will coordinate with on-going protection efforts, and any mitigation measures that will be implemented to avoid further degradation of water quality within impaired waters. Antidegradation provisions of the CWA apply to those waterbodies where water quality standards are currently being met. This provision prohibits degrading the water quality unless an analysis shows that important economic and social development necessitates some degradation of water quality. The SEIS evaluation should determine how the antidegradation provisions would be met.

### **Public Drinking Water**

Public drinking water supplies and/or their source areas often exist in many watersheds. It is possible that source water areas may exist within the planning area. Source water is water from streams, rivers, lakes, springs, and aquifers that is used as a supply of drinking water. The 1996 amendments to the Safe Drinking Water Act (SDWA) require federal agencies to protect sources of drinking water for communities. State agencies have been delegated responsibility to delineate and map each federally-regulated public water system, and to conduct source water assessments and provide a database of information about the watersheds and aquifers that supply public water systems. If this project may impact sources of drinking water, EPA recommends that FHWA contact the Alaska Department of Environmental Conservation to help identify source water protection areas within the planning area. The SEIS should:

- Identify all source water protection areas within the project area;
- Identify all activities and potential contaminants caused by those activities that could potentially affect source water areas; and
- Identify all measures that would be taken to protect the source water protection areas in the SEIS.

### **Wetlands and Riparian Areas**

The SEIS should describe all waters of the U.S. that could be affected by the project alternatives, and include maps that clearly identify all waters within the planning area. The document should include data on acreages and channel lengths, habitat types, values, and functions of these waters. Projects affecting waters of the U.S. would need to comply with CWA Section 404 requirements. Section 404 regulates the discharge of dredged or fill material into waters of the U.S., including wetlands and other special aquatic sites. The Corps issues Section 404 permits.

If project alternatives involve discharge of dredged or fill material into waters of the U.S., the SEIS should include information regarding alternatives to avoid the discharges or how potential impacts caused by the discharges would be minimized and mitigated. This discussion would include the following elements:

- acreage and habitat type of waters of the U.S. that would be created or restored;
- water sources to maintain the mitigation area;
- re-vegetation plans, including the numbers and age of each species to be planted, as well as special techniques that may be necessary for planting;
- maintenance and monitoring plans, including performance standards to determine mitigation success;
- size and location of mitigation zones;

- parties that would be ultimately responsible for the plan's success; and
- contingency plans that would be enacted if the original plan fails.

Mitigation should be implemented in advance of the impacts to avoid habitat losses due to the lag time between the occurrence of the impact and successful mitigation.

### **Roads and Facilities**

As the planning of the SEIS continues, EPA recommends that FHWA evaluate the impacts roads, facilities and other infrastructure would have on waterbodies in the planning area. In particular, roads contribute more sediment to streams; interrupt the subsurface flow of water, especially where roads cut into steep slopes; may fragment habitats and disturb wildlife; and accelerate noxious weed infestations. The SEIS should include data about existing road networks and evaluate the change in road miles and density that will occur as a result of project and predicted impacts to water quality by roads. The SEIS should note that, under the CWA, any construction project disturbing a land area of one or more acres requires coverage under the National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit for discharges to waters of the U.S. The EIS should document the project's consistency with applicable storm water permitting requirements and should discuss specific mitigation measures that may be necessary or beneficial in reducing adverse impacts to water quality.

Project alternatives that would involve construction of facilities and roads may also compact the soil, thus changing hydrology, runoff characteristics, and affecting flows and delivery of pollutants to water bodies and ecological function of the area. Therefore, the SEIS should include a detailed discussion of the cumulative effects from this and other projects on the hydrologic conditions within the planning area. The document should clearly depict reasonably foreseeable direct, indirect, and cumulative impacts to groundwater and surface water resources. For groundwater, the potentially affected groundwater basin(s) should be identified and any potential for impacts to springs or other open water bodies and biologic resources should be analyzed.

### **Invasive Species**

The SEIS should contain measures that are consistent with Executive Order 13112 on Invasive Species. We suggest including any existing FHWA direction for noxious weed management, a description of current conditions, and best management practices that will be utilized to prevent, detect, and control invasives in the project area. The SEIS should also discuss measures that would be implemented to reduce the likelihood of introduction and spread of invasive species with the proposed management activities. EPA encourages FHWA to promote integrated weed management, with prioritization of management techniques that focus on non-chemical treatments first, and mitigation to avoid herbicide transport to surface or ground waters. Early recognition and control of new infestations is critical to stop the spread of the infestation and avoid wider future use of herbicides, which could correspondingly have more adverse impacts on biodiversity, water quality and fisheries.

While EPA fully supports control of noxious weed infestations, we note that weed control chemicals can be toxic and have the potential to be transported to surface or ground water following application. It is important that management direction assures that water contamination concerns of herbicide usage be fully evaluated and mitigated. Herbicide drift into

streams and wetlands could adversely affect aquatic life and wetland functions such as food chain support and habitat for wetland species. All efforts should be made to avoid movement or transport of herbicides into surface waters that could adversely affect fisheries or other water uses (i.e., use mitigation measures avoid herbicide drift to streams and wetlands, during ground and aerial applications of herbicide such as adequate streamside buffers, mechanical weed removal adjacent to streams, flagging aquatic areas on the ground, spray nozzles that produce larger droplets to reduce drift, use of photodegradable dyes in herbicides, use of GPS technology, use of spray detection cards, wind monitoring, herbicide monitoring, etc.).

Plant seeds can be carried from a source area by the wind or migrating animals, on equipment tires and tracks, by water, and on the boots of workers and area users, so care should be taken to implement control procedures in all source areas to avoid spread to unaffected areas. For your information, measures we often recommend at the project level for preventing spread from source areas to uninfested areas include:

- ensure that equipment tracks and tires are cleaned prior to transportation to an uninfested site;
- focus control efforts at trail heads and transportation corridors to prevent tracking of seed into uninfested areas;
- attempt to control the spread from one watershed to another to reduce water as a transport vector;
- reroute trails/roads around the infestation to reduce available vectors for spread if a localized infestation exists and control is not a viable option;
- establish an education program for workers and users and encourage voluntary assistance in both prevention and control activities; and
- reseed disturbed sites as soon as possible following disturbance.

The FHWA may want to consider some restrictions on vehicles to reduce potential for reinfestation of the area by noxious weeds after treatment. Also, if sufficient vegetation is killed during ground disturbing activities (e.g., filling, grading or leveling) it may warrant revegetation efforts. We believe that revegetation (reseeding with native grass mix) should be expanded to seed any site within the control area where the vegetation density is low enough to allow reinfestation or introduction of other noxious weeds, or erosion. The goal of the seeding program should be to establish the sustainability of the area. Where no native, rapid cover seed source exists, we recommend using a grass mixture that does not include aggressive grasses, thereby allowing native species to eventually prevail.

We also note that hay can be a source of noxious weed seed. Hay/straw is often used as mulch to slow erosion and encourage seed germination. The Federal Noxious Weed Act of 1974 prohibits the interstate transport of noxious weeds or weed parts, such as seed. The FHWA may want to discuss the option of requiring use of certified weed free hay in permits or projects.

### **Recreation, Subsistence Activities and Access**

The impacts from recreation, subsistence activities, and access should be analyzed and reported in the SEIS, particularly those impacts associated with vehicle usage. Impacts from off road vehicle (ORVs) and snowmachine use can result in habitat destruction, increased sedimentation to water bodies, noise and air pollution. The SEIS should disclose all impacts

associated with such activities and describe what actions will be taken to manage recreational, subsistence and access opportunities in the project area. EPA specifically encourages FHWA to control and direct OHV and snowmachine use to protect resources (i.e., wildlife habitat and security) and prevent erosion, including adequate policing and enforcement.

EPA notes that OHV and snowmachine use is increasing, and their 2-stroke engines mix the lubricating oil with the fuel and both are expelled as part of the exhaust, and allow up to one third of the fuel delivered to the engine to be passed through the engine and into the environment virtually un-burned. As stated in the U.S. Department of the Interior document, *Air Quality Concerns Related to Snowmobile Usage in National Parks, Feb. 2000*, hydrocarbon emission rates from 2-stroke snowmachine engines are about 80 times greater than those found in a 1995-96 automobile engines. A majority of these hydrocarbons are aromatic hydrocarbons, including polyaromatic hydrocarbons, which are considered to be the most toxic component of petroleum products, and aromatic hydrocarbons are also associated with chronic and carcinogenic effects. Increased air pollutant emissions could be problematic during short periods of poor air dispersion (e.g., valleys where frequent inversion conditions may trap air pollutants).

There are numerous studies that have been undertaken to further determine the environmental effects of these pollutants. The National Park Service Final EIS for Winter Use in Yellowstone and Grand Teton National Parks contains a good summary of the science regarding impacts from snowmachine use. EPA recommends that FHWA consider the results of these studies and factor the results into the SEIS, particularly since a stated need for the project is to provide access to new areas for additional recreational opportunities. The EPA encourages any actions that will promote the use of the newer, less polluting 4-stroke engine vehicles.

#### **Endangered Species Act (ESA)**

Evaluation of the SEIS should identify the endangered, threatened, and candidate species under ESA, and other sensitive species, such as State Species of Special Concern, within the project area. The SEIS should describe the critical habitat for the species; identify any impacts the project will have on the species and their critical habitats; and how FHWA will meet all requirements under ESA, including consultation with the U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS). The SEIS may need to include a biological assessment and a description of the outcome of consultation with the FWS and NMFS under Section 7 of the Endangered Species Act. FHWA actions should promote the recovery of declining populations of species.

#### **Indirect Impacts**

The Council of Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA state that the environmental consequences section of an EIS should include: "Indirect effects and their significance (40 CFR 1502.16(b))." Indirect effects are defined as "...caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth- or development-inducing effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems" (40 CFR 1508.9(b)). The CEQ regulations also indicate that the EIS should include the "means to mitigate adverse environmental effects," which applies to indirect effects as well as direct effects. Since providing access to areas currently inaccessible to the general public will likely

result in growth and development, EPA recommends that potential impacts from likely growth scenarios be fully evaluated and disclosed in the SEIS.

### **Cumulative Impacts**

NEPA requires that cumulative impacts be addressed as a summary of the individual impacts of the proposed action and all other past, present, and "reasonably foreseeable" future actions, including evaluation of direct and indirect effects of these projects on all resource categories, including water quality, aquatic habitat, fisheries, wetlands, air quality and wildlife habitat. This includes analysis and disclosure of activities on adjacent private land irrespective of what agency/entity has decision-making authority or analysis responsibility. We believe cumulative impacts analysis and disclosure is important for long-term or "permanent" projects because resources must be examined at many temporal scales, and is well suited to evaluation of long term trends and sustainability.

In January 1997 the President's Council on Environmental Quality (CEQ) published, "*Considering Cumulative Effects under the National Environmental Policy Act*", guidance that provides a framework for analyzing cumulative effects. In May 1997 EPA published a document entitled, "*Consideration of Cumulative Effects in EPA Review of NEPA Documents*". This document is available at <http://www.epa.gov/compliance/resources/policies/nepa/cumulative.pdf>. EPA considers five key areas of information in reviewing cumulative effects analyses:

- clear identification of resources being cumulatively impacted and the geographic area where impacts occur;
- use of appropriate analysis area boundaries for the resource and time period over which the cumulative effects have occurred or will occur;
- identification of impacts to resources of concern in each area through analysis of cause-and-effects relationships (include scientifically defensible threshold levels);
- adequate evaluation of all past, present, and reasonable foreseeable future actions that have affected, are affecting, or would affect resources of concern (include adequate evaluation vs. benchmark or baseline conditions); and
- disclosure of the overall cumulative impacts expected if the individual impacts are allowed to accumulate, including exceedances of any of the established threshold levels in comparison to baseline conditions. Provide comparisons of cumulative impacts for the proposed management direction and the reasonable alternatives in relation to the no action alternative and/or an environmental reference point.

While a broad consideration of resources is necessary for adequate assessment of cumulative impacts, the analysis should be focused on those resources that are significantly impacted. The SEIS should identify the resources of concern or ecosystem components that might be affected by the proposed action or its alternatives. The ecological requirements necessary to sustain the resources of concern should be considered when assessing how the project and the other past, present and reasonably foreseeable future actions may cumulatively affect the resources of concern. Often these ecological requirements may extend beyond the boundaries of the project area, but reasonable limits should be made to the scope of the analysis.

A common inadequacy of environmental analyses is the lack of analysis or disclosure of the sum of individual effects of all projects on the local environment. A summary listing of other projects occurring in the vicinity without the accompanying analysis is insufficient. Another frequent oversight is that Agencies often tend to limit the scope of their analyses to those areas over which they have direct authority or to the boundary of the relevant management area or project area. This may not cover the effects to the area or resources of concern.

### **Monitoring**

Because this project could potentially impact a variety of resources in the project area and for an extended period of time, we recommend that the project alternatives be designed to include an environmental inspection and mitigation monitoring program to ensure compliance with all mitigation measures and assess their effectiveness. The SEIS should describe the monitoring program and how it would be used as an effective feedback mechanism so that any needed adjustments can be made to as needed to meet environmental objectives.

### **Mitigation**

A comprehensive discussion of proposed mitigation for direct, indirect and cumulative impacts is required by the Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 CFR Part 1500). The CEQ regulations state that an EIS should include the means to mitigate adverse environmental effects and disclose the effectiveness of mitigation measures in minimizing adverse effects (40 CFR 1508.7). Simply listing the mitigation measures is insufficient to qualify as the reasoned discussion and "hard look" required by NEPA. Mitigation measures must be discussed in sufficient detail to ensure that potential detrimental environmental effects and measures to mitigate those effects have been fairly evaluated. Monitoring plans are also needed for measuring the effectiveness of the mitigation measures (quantitatively-if possible, and/or a qualitatively), and determining the need for modifying mitigation. The SEIS should also address coordination efforts and funding or budget needs required to undertake or implement monitoring and mitigation measures.

### **Climate Change**

According to numerous recent scientific and governmental studies and reports, the earth's surface temperature has risen in the past century, with accelerated warming during the past two decades. There is strong evidence that most of the warming over the last 50 years is attributed to human activities, in particular those that result in the build up of greenhouse gases (carbon dioxide, methane, and nitrous oxide). The heat trapping property of these gases is undisputed although uncertainties exist about exactly how earth's climate responds to them. Climate responses vary at different locations on the earth, but accelerated changes are being documented in the northern latitudes, including Alaska. Effects of climate change may include changes in hydrology, sea level, weather patterns, precipitation rates, and chemical reaction rates. The SEIS should therefore consider how resources affected by climate change could potentially influence the project and vice versa, especially within ecologically sensitive areas.

### **Coordination with Federally-Recognized Tribal Governments**

Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments* (November 6, 2000), was issued in order to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal

implications, and to strengthen the U.S. government-to-government relationships with federally-recognized tribal governments. If this project could affect resources of use or concern to tribal governments or their members, then the SEIS document should describe the process and outcome of government-to-government consultation between FHWA and each of tribal government involved, issues that were raised, if any, and how those issues were addressed.

### **Cultural Resources**

Impacts on cultural resources are often of concern to Indian tribes, both recognized and non-recognized, but they are also of concern to other groups as well. The NEPA regulations, at 40 CFR 1508.27(b) (3) and (8), require that effects on cultural resources be considered in judging the significance of environmental impacts. A variety of specific federal laws, as well as the laws of many states, Indian tribes, and other jurisdictions and a number of international conventions and recommendations, apply to the management of impacts on different kinds of cultural resources, such as:

- Historic buildings, structures, sites, districts, and landscapes;
- Religious practices, beliefs, and places;
- Traditional uses of land and resources;
- Ancestral human remains and burial sites; and
- Traditional ways of life.

FHWA should ensure that all such impacts are considered in an orderly and systematic manner, in full consultation with all concerned parties, especially those who may ascribe cultural importance to such resources. Such parties should be contacted early in the scoping process and consulted throughout the analysis, documentation, and review process.

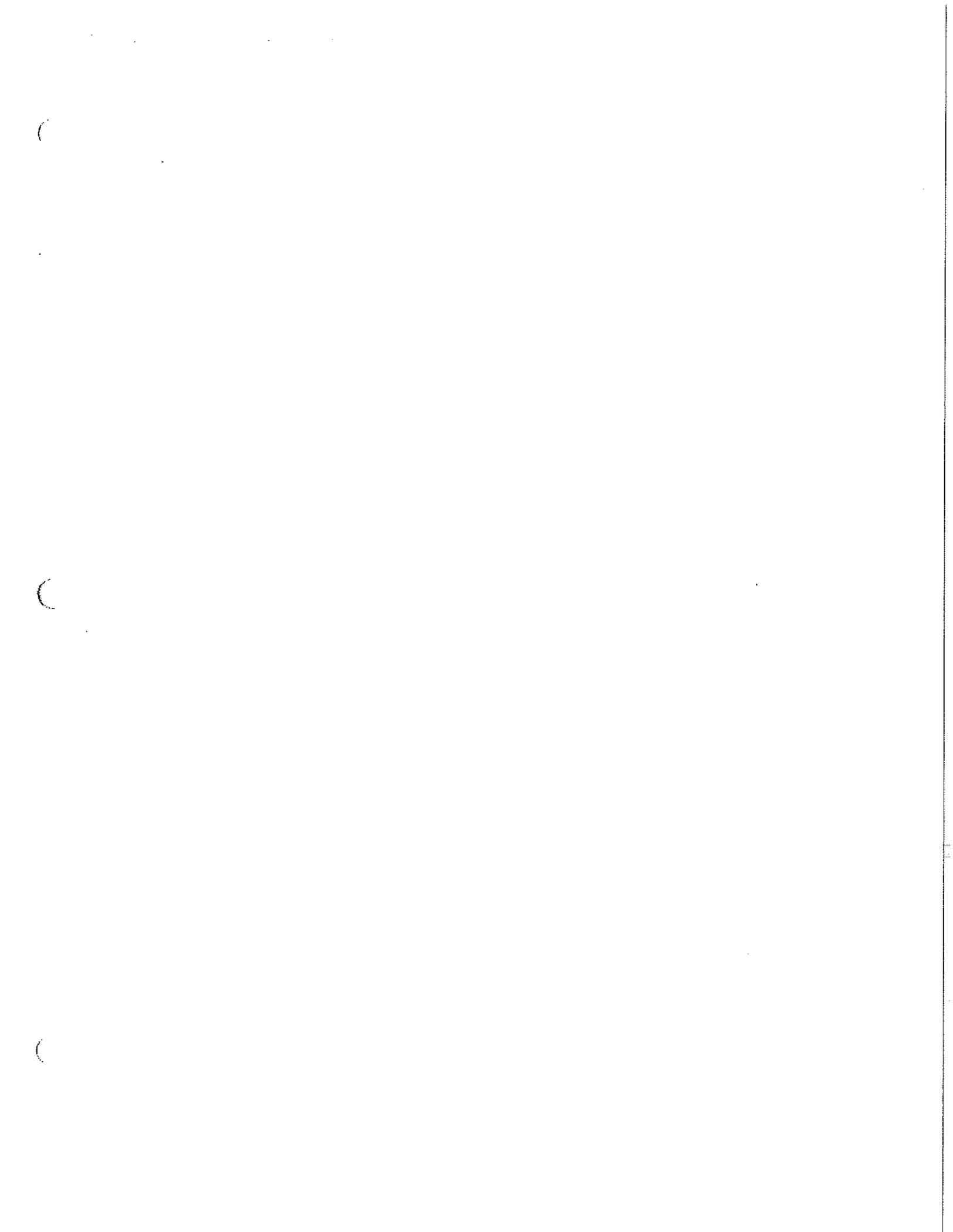
Section 106 of the National Historic Preservation Act and its implementing regulations (36 CFR 800) outlines specific procedures to be used in examining potential impacts on historic places. These procedures should be carefully followed in the course of any NEPA analysis, but agencies must be careful not to allow attention to Section 106 review to cause analysts to give insufficient consideration to other kinds of cultural resources. Not all cultural resources are "historic properties" as defined in the National Historic Preservation Act (that is, places included in or eligible for the National Register of Historic Places); hence they cannot all be addressed through Section 106 review, but this does not mean that they do not need to be addressed under NEPA.

EPA recommends that no Record of Decision (ROD) be completed until the processes of consultation, analysis, review and documentation required by Section 106 of NHPA have been fully completed. If adverse effects to historic properties are identified, any Memorandum of Agreement (MOA) developed to resolve these concerns under Section 106 of NHPA should be referenced in the ROD. Unless there is some compelling reason to do otherwise, the Section 106 MOA should be fully executed before a ROD is issued, and the ROD should provide for implementation of the MOA's terms.

**Public Participation and Environmental Justice**

The SEIS should disclose what efforts were taken to ensure effective public participation. In addition, if low income or people of color communities will be impacted by the proposed plan, the EIS should disclose what efforts were taken to meet environmental justice requirements consistent with Executive Order (EO) 12898 (*Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*). EO 12898 requires that Federal agencies make environmental justice part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations. Environmental justice encompasses a broad range of impacts covered by NEPA, including impacts on the natural or physical environment and interrelated social, cultural, and economic impacts. If applicable, we recommend that the FHWA develop a strategy for effective public involvement of minority and low-income populations in land management considerations, analyzing environmental, social, cultural and economic effects, and developing mitigation measures. Detailed guidance on addressing Executive Order 12898 in NEPA documents is available from CEQ at <http://ceq.hss.doe.gov/nepa/regs/ej/justice.pdf>.

**ENCLOSURE 2**



## ENCLOSURE 3

### Mitigation Measures to Reduce Emissions During Construction

- Properly maintain construction equipment.
- Evaluate the use of available alternative engines and diesel fuels:
  - Engines using fuel cell technology
  - Electric engines
  - Engines using liquefied or compressed natural gas
  - Diesel engines that meet the proposed EPA 2007 regulation of 0.01 g/bhp-hr (grams per brake horsepower hour)
  - Diesel engines outfitted with catalyzed diesel particulate filters and fueled with low sulfur (less than 15 ppm sulfur) fuel
  - Diesel engines fueled with biodiesel (diesel generated from plants rather than petroleum)
  - Fueling on-site equipment, e.g., mining equipment, with lower sulfur highway diesel instead of off-road diesel fuel
- Reduce construction-related traffic trips and unnecessary idling of equipment.
- Use newer, “cleaner” construction equipment.
- Install control equipment on diesel construction equipment (particulate filters/traps (DPTs), oxidizing soot filter, oxidation catalysts, and other appropriate control devices to the greatest extent that is technically feasible.) A particulate filter (“P-trap” or oxidizing soot filter) may control approximately 80% of diesel PM emissions. An oxidation catalyst reduces PM emissions by only 20%, but can reduce CO emissions by 40%, and hydrocarbon emissions by 50%. Different control devices may be used simultaneously.
- Reroute the diesel truck traffic away from communities and schools.
- Adopt a “Construction Emissions Mitigation Plan (CEMP). A CEMP would help to ensure that the procedures for implementing all proposed mitigation measures are sufficiently defined to ensure a reduction in the environmental impact from diesel PM and NOx due to the project’s construction. CEMP inclusions:
  - All construction-related engines are tuned to the engine manufacturer’s specifications in accordance with the timeframe recommended by the engine manufacturer; not idle for more than 5 minutes; not tampered with in order to increase engine horsepower; include particulate traps, oxidation catalysts and other suitable control devices on all construction equipment used at the construction site; and use diesel fuel having a sulfur content of 15 ppm or less, or other suitable alternative diesel fuel. Minimize construction-related traffic trips through appropriate policies and implementation measures.
  - Implement an adaptive mitigation measure program over the project’s construction phase.

**Construction Mitigation Measures  
Adopted for Several Major Projects in California**

**A. Administrative**

1. Have a Mitigation Plan that is included in the FEIS and committed to in the ROD.
2. Require reporting.
  - a. Prepare inventory of all equipment prior to construction.
  - b. Report on suitability of add-on controls for each piece of equipment before groundbreaking.\*
  - c. Evaluate other engine alternatives: electric, CNG, LNG, fuel cell, alternative diesel.
  - d. Monthly, public reports by Environmental Coordinator regarding fulfillment of requirements
3. Have suitability report subject to review by Air District, USDOT, State DOT, EPA and the public.

**B. Equipment**

1. Use add-on controls such as catalysts and particulate traps where suitable.
2. Use fuel with 15 ppm of sulfur or less unless unavailable.
3. Establish idling limit (e.g., 5-10 minutes per hour).
4. Tune to manufacturers' specs and do so at manufacturers' recommended frequency.
5. Prohibit any tampering with engines and require continuing adherence to manufacturers' recommendations.
6. Require that leased equipment be 1996 model or newer unless cost exceeds 110% of average lease cost.
7. Require 75% of total horsepower of owned equipment to be used to be 1996 or newer models.

**C. Work limitations**

1. Establish a cap on daily emissions and/or hours of work.
2. Use no more than 2 pieces of equipment simultaneously near or upwind from sensitive receptors.
3. Establish additional emissions limits within 1000 feet of any K-12 school.
4. Provide notification to all schools within 1000 feet.
5. Reduce truck trips and/or restrict hours of driving through communities to minimize risk.

\* Suitability of control devices is based on whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused by the construction equipment engine, or whether there may be a significant risk to nearby workers or the public. Such determination is to be made by the Contract Project Manager (CPM) in consultation with the appropriate vendor.

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
Seventeenth Coast Guard District

P.O. Box 25517  
Juneau, Alaska 99802  
Staff Symbol: dpw  
Phone: (907) 463-2268  
Fax: (907) 463-2273  
Email: James.N.Helfinstine@uscg.mil

16590  
October 9, 2008

Mr. David C. Miller  
Division Administrator  
Federal Highway Administration  
P.O. Box 21648  
Juneau, Alaska 99802

Re: Coast Guard Acceptance as Cooperating Agency on the Gravina Access Project

Dear Mr. Miller,

The Coast Guard Bridge Administration program accepts your recent invitation to be a cooperating agency on the Supplemental Environmental Impact statement (SEIS) for the proposed Gravina Access Project near Ketchikan, Alaska. It is our understanding that the purpose of the project is to provide access between Revillagigedo Island and Gravina Island.

Our agency issued two permits (1-06-17) and (2-06-17) dated April 13, 2006 facilitating Alternative F1: *Bridges (200-foot East and 120-foot West) Between South Tongass Avenue and the Airport, via Pennock Island*, noted to be FHWA's and AKDOT&PF's Preferred Alternative. It has been brought to our attention that AKDOT&PF has moved forward with the first phase of implementing Alternative F1: construction of the Gravina Island Highway. It is our understanding due to increases in the estimated cost, the State cannot fund the Selected Alternative and is now looking for a less costly alternative for access to Gravina Island instead of proceeding further with the two bridges associated with Alternative F1.

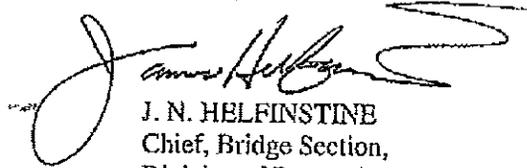
Review of the extensive navigational studies and research within the final EIS will pointed out that the 200-foot vertical clearance provided by the east channel bridge is a necessity. Anything less will not meet the reasonable needs of navigation. Whatever is built across the east channel of Tongass Narrows must allow cruise ship passenger vessels a high level crossing equivalent to that provided by the historical navigational shipping route presently utilized along the west coast (the East Channel bridge will provide a vertical navigational clearance equal to that provided by the Lions Gate bridge located in Vancouver, B.C.) The cruise line industry has indicated that if an alternative is utilized that restricts passage they may be forced to bypass Ketchikan. This would be devastating to a community who's economy has transformed from a diminishing timber industry to that based on cruise ship related tourism. It appears that an alternative involving a mechanical bridge discounted earlier may present itself a more viable option given the circumstances.

16590

October 9, 2008

Our agency looks forward to working with all parties to find a solution to your dilemma. Perhaps our counterparts in locations outside of Alaska with mechanical bridges can be of assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "James Helfinstine", with a large, stylized flourish at the end.

J. N. HELFINSTINE  
Chief, Bridge Section,  
Division of Prevention &  
Waterways Management Branch  
U. S. Coast Guard  
By direction of the Commander

Project: Design Build Gravina	Project No: 19752
Date: May 7, 2008	Subject: Eagle Nest Surveys
Call to: Phil Schempf	Phone No: 907-780-1171
Call from: Cecile Davis	Phone No: 907-644-2167

**Discussion, Agreement and/or Action:**

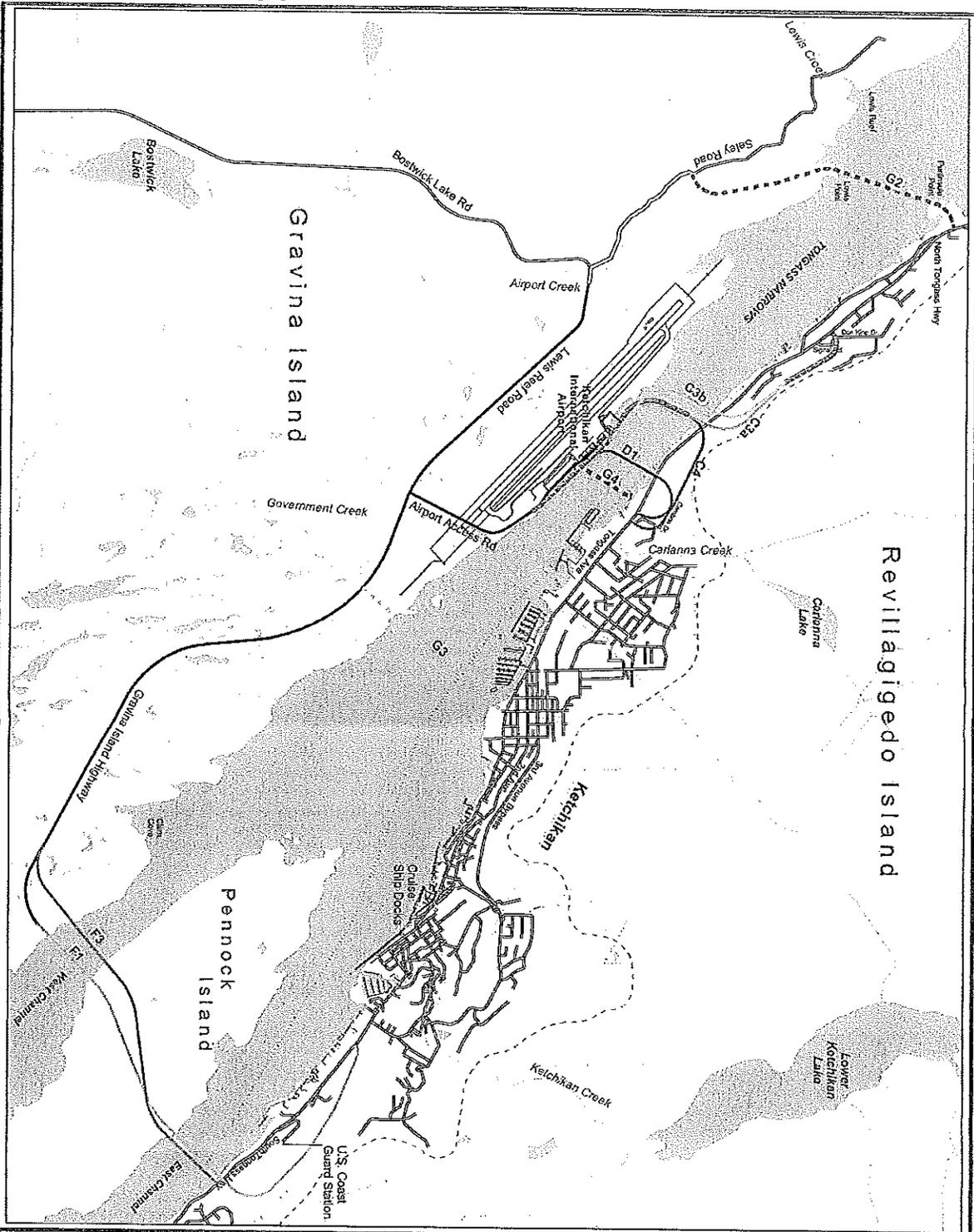
I conversed via e-mail with Phil Schempf on April 24, 2008 – please see below:

*Here's what I have for Tongass Narrows. The most recent information is 2000, eight years out of date. Our usual recommendation is if an area hasn't been surveyed in 7 years that it should be resurveyed. I will be in Ketchikan later this year to fly some surveys south of town and could possibly survey this area. It needs to be done by skiff - most folks don't like helicopters blowing the shingles off their houses. I don't know of a survey related to the Gravina Highway project, but I see two new sites that haven't made it into our catalog yet. Nest #96 is on Government Creek about 1/2 mile south of the SE end of the airport runway (approx. 55.34432° N, 131.69783°W) and nest #97 is on the islet labeled East Clump about 3/4 mile SE of the SE end of the runway (approx. 55.34484°N 131.68741°W). These were found in May 2007. There may be other nests in the area I am not aware of.*

I called Phil this morning to ask him if he was planning any surveys in our project area. He informed me that he will be surveying George Inlet and Carroll Inlet which are approximately 20 miles NE of Ketchikan.

He did ask to see a copy of our survey though.

Will add Eagle surveys in the field work scope.



### Reasonable Alternatives Evaluated in the FEIS and Recent Gravina Island Developments

#### LEGEND

- recently constructed roads
- common to multiple alternatives
- road constructed independent of FEIS
- Bridge Alternatives\*:
  - C3a (2007 x 5309)
  - C3b (1207 x 5207)
  - C4 (2007 x 5207)
  - D1 (1207 x 5207)
  - F1 (WEST 1207 x 5207)
  - F2 (EAST 1207 x 5207)
  - F3 (EAST 160 x 5207)
- use case: multiple alignments
- Ferry Alternatives:
  - G2\*\*
  - G3
  - G4
- Bypass Road (proposed)
- city boundary
- walking road
- docks
- stream

\*Dimensions listed refer to bridge navigation opening (vertical x horizontal)

\*\*G2 connection slightly modified from FEIS



Date: May 15, 2023  
 Project: Gravina Island Ferry System  
 Author: HDR Alaska, Inc.  
 Source: KOD, HDR Alaska, Inc.

The information displayed here is for planning purposes only. It is not intended to be used for final design or construction. This document is for review purposes only and is not intended for use in making any decisions or commitments.



0 0.25 0.5 Miles

Project: Design Build Gravina	Project No: 19752
Date: May 7, 2008	Subject: Special Visual Flight Rule Exemption 4760
Call to: Mick Green, Principal Operations Insp., FAA	Phone No: 907-790-7370
Call from: Cecile Davis	Phone No: 907-644-2167

**Discussion, Agreement and/or Action:**

I called Mick Green, FAA Principal Operations Inspector, this morning to discuss exemption No. 4760.

Mick provided the following explanation:

The exemption is still in effect but is now used 50% less than before. Alaska Airlines changed their procedures (6 or 7 years ago) to include "Required Navigational Performance" (RNP).

*Side note: RNP description per [http://en.wikipedia.org/wiki/Required\\_Navigation\\_Performance](http://en.wikipedia.org/wiki/Required_Navigation_Performance)*

*Under RNP, the nature of the navigational aids is not specified, rather the volume of airspace around the aircraft is, and this volume may be smaller (in some cases much smaller) than that of conventional navigation. In practice, the RNP aircraft is assumed to be navigating using a combination of ground-based navaids (radio navigation), GPS, and inertial guidance systems, which give far greater precision than previously possible. This allows air traffic control to reduce the spacing between aircraft without compromising safety. Certain blocks of airspace are being designated with RNP standards; only aircraft meeting the designated RNP level for that airspace will be allowed to operate in that area.*

He explained that when Alaska Airlines is in route using RNP (which is approximately 80% of their operations), other aircraft are not allowed to use the airspace. At the Ketchikan Airport there is a 10 minute minimum prior to an Alaska Airlines plane landing, and a 5 minute after landing.

Mick added that there might be new procedures in September 2008 when the airport project will be complete, and he would be happy to share that information with us.

-----Original Message-----

From: Phil\_Schempf@fws.gov [mailto:Phil\_Schempf@fws.gov]  
Sent: Thursday, April 24, 2008 9:04 AM  
To: Davis, Cecile  
Subject: Re: Eagle nest locations in the Tongass Narrows

Cecile-

Here's what I have for Tongass Narrows. The most recent information is 2000, eight years out of date. Our usual recommendation is if an area hasn't been surveyed in 7 years that it should be resurveyed. I will be in Ketchikan later this year to fly some surveys south of town and could possibly survey this area. It needs to be done by skiff - most folks don't like helicopters blowing the shingles off their houses. I don't know of a survey related to the Gravina Highway project, but I see two new sites that haven't made it into our catalog yet. Nest #96 is on Government Creek about 1/2 mile south of the SE end of the airport runway (approx. 55.34432° N, 131.69783°W) and nest #97 is on the islet labeled East Clump about 3/4 mile SE of the SE end of the runway (approx. 55.34484°N 131.68741°W). These were found in May 2007. There may be other nests in the area I am not aware of.

Phil

(See attached file: TongassNarrows408.dbf)

\*\*\*\*\*  
Philip F. Schempf voice: (907) 780-1171 or 1163  
Migratory Bird Management-Raptors fax: (907) 586-7378  
U. S. Fish and Wildlife Service email: phil\_schempf@fws.gov  
3000 Vintage Blvd., Suite 240  
Juneau, Alaska 99801 USA 58°18'N 134°25'W  
\*\*\*\*\*

"Davis, Cecile"  
<Cecile.Davis@hdr  
inc.com> To  
<Phil\_schempf@fws.gov> cc  
04/21/2008 01:00 PM  
Subject  
Eagle nest locations in the Tongass  
Narrows

Good morning Phil,  
Thanks for returning my call promptly. I decided that an e-mail with an attached figure would be the easiest way to show you my project area.

I am currently working on the Supplemental Gravina EIS, and I am tasked with updating the base information on the project. The Gravina Access Project EIS was signed in 2004. At the time no eagle nest survey was performed. They just collaborated with USF&WS and obtained existing

information, similar to what I am doing now. There was some mention that an eagle nest survey would be performed when the Gravina Island Highway was going through construction - did that survey occur?

I was hoping that you could look at this figure and send me any known locations in the form of lats and longs so that our GIS technician can digitize them in our maps.

Thank you

Cecile

[attachment "alternatives\_11x17\_draft\_v2.pdf" deleted by Phil Schempf/R7/FWS/DOI]

Project: Design Build Gravina	Project No: 19752
Date: April 24, 2008	Subject: Fish Stream Surveys
Call to: Mark Minnillo, ADNR_OHMP Habitat Biologist III	Phone No: 907-826-2560 or cell 907-321-1760
Call from: Cecile Davis	Phone No: 907-644-2167

**Discussion, Agreement and/or Action:**

I conversed with Mark on April 24 regarding fish stream in the project vicinity of the Gravina Access Project

Mark had just returned from Ketchikan where the Government Creek has been re-routed. The upper portion was constructed, but the lower portion was still getting worked on. Mark offered to give us a copy of the Report on his findings.

Mark also informed me that on June 18, 2007 he conducted a stream survey of Bolder Creek, Gravina Creek, an unnamed creek between Gravina and Rain Creeks, Rain Creek and Stensland Creek. HE said that nothing had changed since his survey for the Gravina project. Mark offered to provide us with the findings of that report as well.

Project: Gravina Access Project SEIS	Project No: 07072-81225
Date: April 8, 2008	Subject: Reevaluation of Wetland Study
Call to: Nicole Hayes (USACOE)	Phone No: 907.753.2712
Call from: Jeff Schively (HDR)	Phone No: 907.644.2016

**Discussion, Agreement and/or Action:**

I called Nicole Hayes (U.S. Army Corps of Engineers – Regulatory) to discuss the wetland mapping and reporting that had been done for the Gravina Access Project EIS and to ask whether the Corps would require any part of the work to be revisited in conjunction with the reevaluation of the project under a Supplemental EIS.

Nicole stated that the SEIS project can use the same delineation as submitted with the original EIS with some conditions:

- Some ground truthing of boundaries must be completed to ensure wetland/upland conditions have not changed over the past 8 years since the original fieldwork was completed. This ground truthing does not have to be a thorough delineation of wetlands but rather a reconnaissance level field study that revisits and verifies some of the original data.
- Nicole would like to see field teams revisit previous data form locations from 2000. This would allow a comparison of site conditions from 2000 to 2008. This would also permit the Corps to assess the treatment of field characteristics and conclusions as sampled using the 1987 wetland delineation manual versus the 2007 Alaska Supplement to the Wetland Delineation Manual.
- If higher quality, more recent datasets (i.e., new aerial photography, topographic information, stream mapping, etc.) exist, than wetland mapping should be revisited and boundaries adjusted to match those higher resolution datasets (i.e., use the best possible base mapping available at the time of the study).
- Nicole would like field teams to visit areas adjacent to newly constructed roads on the Gravina side (Gravina Island Highway and Lewis Reef Road) to determine if the new roads have altered the wetland/upland status of any areas.
- If new alternatives are defined outside of the EIS wetland mapping boundary, apply a higher level of effort to map wetland/upland boundaries in those locations since they lack 2000 data.
- Use data forms and sampling procedures as described in the 2007 Alaska Supplement to the Wetland Delineation Manual.

I also asked Nicole if she recalls if the Corps had issued a "jurisdictional determination concurrence" letter for the original wetland delineation included in the EIS (HDR has been unable to track down a copy in project files and does not recall one being issued). She stated that she did not know if a letter was issued or not but noted during that time period, JD letters were not issued on a regular basis and there is a high probability that a letter had not been compiled for the project. Since the permit application went to Public Notice (and is still an active application in their system) using the HDR supplied wetland/upland boundaries, she agreed with me that there was an assumed concurrence of those boundaries regardless if the JD letter was written or not.

**Action Item**

HDR will prepare a scope and cost estimate to conduct a reconnaissance-level field study of wetlands to reevaluate the EIS wetland work.

Project: Gravina Access Project	Project No: 07072-19752
Date: March 31, 2008	Subject: Berths
Call to: Karl Amylon Steve Corporon	Phone No: 907-228-5603 907-228-5632
Call from: Cecile Davis	Phone No: 907-644-2167

**Discussion, Agreement and/or Action:**

Berth IV is currently under construction and will be completed before May when the Cruise ship season begins – This Berth is being developed by a private Entity – Ketchikan Dock – in the Casey Moran Harbor, and will be leased to the City for 30 years. Berth III is new since the EIS and is an extension of Berth II. (Karl Amylon –City of Ketchikan). There is a council meeting on Thursday April 3, 2008 to decide whether Birth I and II should be reconstructed or spend money once a year to fix the problems

I also talked to Port Director Steve Corporon, who confirmed the above information. He added that Murphy’s float plane base has not been relocated, and no new ones have been constructed.

Steve Corporon sent us a PDF of the Berth Locations for Jon Schick to show the Berths on the GAP Figures.



Subject:	Meeting with SHPO		
Client:	ADOT&PF		
Project:	Gravina Access Project	Project No:	81225
Meeting Date:	May 6, 2008 – 11:00 am-12:15 pm	In Attendance:	Jim Lowell (ADOT&PF), Laurie Mulcahy (Statewide), Stefanie Ludwig and Doug Gasek (SHPO), Julianne Hanson, Kristen Maines, and Cecile Davis (HDR), Mike Yarborough (CRC), Dale Lewis, and Mike Vanderhoof (FHWA)-tel.
Notes by: Cecile A. Davis			

Kristen Maines opened the meeting by outlining the objectives which were to open lines of communication and discuss where we are with the project as we kick off the SEIS.

The meeting then continued with a brief background of the project by Kristen Maines and Jim Lowell.

Jim Lowell gave an update on the Gravina Island Highway construction that is scheduled for completion in August 2008.

Mike Yarborough updated the group with archeological field work to date: He explained that for the Gravina Access Project EIS he did a literature review for all alternatives, from Peninsula Point to Pennock Island. He added that he completed two trips to Ketchikan to perform reconnaissance surveys especially for the landing areas for the bridge and the ferry alternatives. His results were then incorporated directly into the EIS. He traveled to Ketchikan more recently and surveyed the first section of the planned Gravina Island Highway and the existing Lewis Reef Road. He did emphasize that the majority of his work was focused on Pennock and Gravina Islands corridor as the preferred alternative was identified early. Commitments were negotiated to conduct a more detailed archeological investigation of the selected alternative (F1).

Mike Vanderhoof from FHWA said that the EIS says there are no known or suspected historic or archeological sites within the APE for Alternatives C3(a), C3(b), C4, D1, G1 or G4.

Mike Yarborough responded that the conclusion was based mostly on reconnaissance surveys.

Laurie Mulcahy from ADOT&PF asked Mike if that was based on his best professional judgment.

Mike Vanderhoof replied that he was disappointed with the level of detail in the EIS.

Mike Yarborough explained that at the time the corridors were vaguely defined. He recommended that for Revilla Island, the Department should have a wider Area of Potential Effect (APE) defined.

Kristen Maines asked what steps would SHPO and FHWA like the DOT (Department) to take.

Laurie Mulcahy asked what alternatives were being reviewed and asked if the Department was planning on re-surveying.

Kristen Maines explained that DOT&PF is moving forward with all alternatives through scoping. Laurie Mulcahy asked how the APE was defined when the prior archeological recon and surveys were performed.

The APE was roughly 300 feet (100 feet on each side of the footprint which was approximately 100 feet).

Laurie Mulcahy asked what was within the 300 feet APE on Revilla Island. Mike explained that he honestly did not know. Laurie Mulcahy explained that we don't have an understanding of what is there and that does need to be addressed.

Mike Vanderhoof asked if the project went through a Section 106 process and if so would it still be valid/would it stand? Can the concurrence still stand if the alternatives have changed?

Stefanie Ludwig explained that if a separate alternative is selected then the Department would have to do a more intensive survey being driven by the archaeology. The visible historic sites had already been identified, so the additional work would be due to archaeology and would not have likely been required for another alternative (Mike Vanderhoof does not believe that Stephanie agreed).

Laurie Mulcahy added that the C and D Alternatives were not thoroughly evaluated for visual impacts.

Kristen Maines explained that the Department still has not identified what alternatives will be evaluated in the SEIS, and those probably wouldn't be determined until after scoping. She also added that this meeting was very preliminary, but with the field season coming up, the Department wanted to know the need for potential field work so that we didn't lose the field season.

Jim Lowell explained that there needs to be a bar set for cost by the administration – a monetary bar would be an important factor in determining what alternatives would be evaluated in the SEIS.

Laurie Mulcahy asked what corridor on Revilla would the Department be looking at for potential crossings.

Jim Lowell responded that it would be mostly by the airport – he didn't anticipate any bridges to the north since alignments up there had been evaluated but eliminated.

Doug Gasek explained that there is a Historic District in "New Town," and that there are known sites south of Carianna Creek, and below the 3<sup>rd</sup> Avenue Bypass.

Mike Yarborough added that the Borough hired an archeologist to survey Seeley's road as part of a USACE project, and that would be a good source for more information.

Julianne Hanson reiterated that the SEIS alternatives will not be selected before the fall, so we can't be alternative specific or we'll miss the field season.

Laurie Mulcahy recommended that first the Department should have a windshield survey on Revilla - get an idea on what is in the area and what may need to be studied further. She also added that the Department should find information that is already there, and then fill in the holes with new data.

Mike Vanderhoof agreed that this is a reasonable starting place. He also added that we should review the Section 106 process that was performed to see if it's still applicable to what the Department is proposing/doing now.

Doug advised that the Department should look at what areas will have visual effects, including the ferry alternatives. He said we should start at Peninsula Point to about where Alternative G3 comes in by the mall. He recommended that the Department should take some line of sight photos.

Mike Vanderhoof observed that we may have to re-open the Section 106 process and identify a new APE. Mike also asked for clarification from Laurie on the difference between a "study area" and an APE. She confirmed they are the same from a practical stand point. Laurie Mulcahy and Mike Vanderhoof will discuss the Section 106 and APE issue.

The meeting was over at 12:15.

**Action items: Get Laurie Mulcahy a copy of the GAP EIS for review and get Laurie a copy of the USACE/SHPO MOA that Doug Gasek provided at the meeting.**



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**Gravina Access Project SEIS  
Agency Scoping Meeting**

**June 10, 2008**

**Cape Fox Hotel  
Ketchikan, AK**

**10:00 am – 11:00 am**

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**Agenda**

- **Introduction and meeting purpose –**
- **Purpose of the SEIS – what will be reviewed**
- **Project schedule**
- **Project Vicinity**
- **Significant Issues to be detailed in the Draft Supplemental Environmental Impact Statement**
- **Scoping Methods**
- **Alternatives**
  - **Reasonable alternative to be carried forward in the DEIS**
  - **Alternative dismissed from further consideration**



Subject:	Preliminary Agency Scoping Meeting		
Client:	ADOT&PF		
Project:	Gravina Access Project	Project No:	81225
Meeting Date:	June 10, 2008 – 10:00 – 11:00 am	Attendees:	Jim Lowell (DOT&PF) Mark Minillo (DNR-OHMP) Kristen Maines (HDR) Leandra Cleveland (HDR)
Notes by: Leandra Cleveland			

**Notes:**

Jim Lowell opened the meeting by reviewing the project history and the purpose of the SEIS. The alternatives were discussed and reviewed. Kristen Maines and Jim Lowell discussed the project schedule and the upcoming scoping schedule. With the SAFETEA-LU requirements there is a requirement for written response to be a participating agency that DNR should be aware of if they want an active role in the project. The scoping notices will be sent out in late June and will outline the cooperating and participating agency roles and requirements. DNR will have to respond to the request within 30 days.

Mark Minillo felt that the level of analysis in the FEIS was appropriate for the fisheries and other DNR resources potentially affected by the project. Mark mentioned that although stream specific surveys were not completed for all of the streams identified in the FEIS and ultimately permitted, the surveys he has conducted since then have found anadromous fish in those streams. Given that permits have been issued and the Gravina Highway is currently under construction, there is no need to re-evaluate streams south of Airport Creek along the Gravina Highway unless a new alternative was developed in this area.

Seeley Road was built several years ago and Mark has the project and stream survey information that he can provide to HDR. The current Seeley Road may not be up to current DOT standards and if the G2 alternative was chosen, then Seeley Road would likely be upgraded and widened. If that is the case then additional stream surveys would be required as the permits and work for the original project are outdated. As well, the G2 alternative proposes a road from the Ferry Landing to Seeley Road. This stretch of new road would also require stream surveys to determine if anadromous fish are present. Any streams found along this stretch would need to analyze using the screening and evaluation methods applied in the FEIS for the streams south of Airport Creek.

The Government Creek realignment and any stream surveys or analysis conducted for the stream is documented in the Runway Project. Therefore additional stream surveys should not be required. Mark mentioned that during follow up monitoring work this year, Government Creek has Coho fry.

The upcoming regulatory change that transfers Title 41 permits from DNR back to Fish and Game on July 1, 2008 should not affect the project. The regulations and process will not change. Mark will still be the primary contact for the project.

Mark provided two additional local biologist contacts with Fish and Game that HDR should contact:

- Boyd Porter – Wildlife Conservation (deer and wolves) (Ketchikan).  
Phone: 907-225-2475  
Email: [boyd.porter@alaska.gov](mailto:boyd.porter@alaska.gov).
- Kelly Piazza – Sport Fish (Ketchikan).  
Phone: 907-225-2859  
Email: [kelly.piazza@alaska.gov](mailto:kelly.piazza@alaska.gov).



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## **Gravina Access Project SEIS Informational Meeting**

**City of Ketchikan**

**June 10, 2008**

**4<sup>th</sup> Floor Conference Room**

**334 Front Street, Ketchikan, Alaska**

**1:00 pm – 3:00 pm**

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### **Agenda**

- Introduction and meeting objectives
- Review project history
- Purpose of the SEIS
- Project schedule
- Opportunities for participation
- Range of alternatives
  - Alternatives considered in original EIS
  - Alternatives screening process
  - Reasonable alternatives to be carried forward in the SEIS
- Questions related to process
- Other?

### **Questions for City of Ketchikan**

1. What is the best way to contact you (letter, email, fax, or phone)?
2. Are there opportunities where we can share project information with you and your organization (regularly scheduled meetings, for example)?
3. Have there been any updates in local plans since 2004?
4. Are there any economic development projects that we should be aware of?
5. Is there anyone else you recommend we talk to?
6. Is there a point of contact, other than yourself, with whom we should have regular contact concerning the project?



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**Gravina Access Project SEIS  
City of Ketchikan Information Meeting**

**June 10, 2008  
City of Ketchikan Manager's Office  
Ketchikan, Alaska**

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## **Participants**

- Karl Amylon, City Manager/KPU General Manager
- Christopher Brewton, Electric Division Manager, City of Ketchikan
- Jim Lowell, Project Manager, DOT&PF
- Kristin Maines, HDR
- Leandra Cleveland, HDR
- Rosetta Alcantra, HDR

The meeting began at 1:05 pm with introductions (see participants list). Mr. Jim Lowell began the meeting by explaining what the purpose of the meeting was and why the project team came to meet with the City of Ketchikan. He explained that the DOT&PF is revisiting the Gravina Access Project Environmental Impact Statement study that was recently completed. This effort is supplementary to the existing document and is an effort to demonstrate to the Federal Highway Administration (FHWA) that the construction of the Gravina Highway Access Road does meet what was presented in the EIS. The goal for the meeting is to discuss if there have been any changes different from the prior effort.

Karl Amylon indicated there continues to be an "access" issue for the community, what the community has now is less than ideal.

Christopher Brewton also indicated that power to Gravina Island to serve the industrial development is needed. Currently, the Electric Division is developing under an EDA grant a submarine cable system. Some work has been completed for permitting and bathometric, the hope is have it all installed by October 2008.

There was also a brief discussion regarding development on the northend of Lewis Creek, Mr. Amylon suggested talking to the Ketchikan Gateway Borough about their efforts on Gravina Island.

Mr. Lowell then asked Kristen Maines to explain the EIS and the schedule. Ms. Maines said a Public Scoping meeting would be held in Ketchikan on July 22, 2008. A letter would also be forthcoming to the city to ask them if they would like to be a participating or cooperating agency, in addition the letter would be requesting formal scoping comments be provided to the project team by August 19<sup>th</sup> 2008. Mr. Amylon asked what would be presented at the public meeting. Ms. Maines indicated the agenda needed to be refined, but suggested that information relating to costs for the alternatives and other screening criteria maybe available. Mr. Amylon also asked if the Governor's office was aware of the meeting dates. He was forthcoming in saying that with the recent cuts by the administration to the budget there will likely be a hostile community at the



meeting. There was also a brief discussion of the importance of having an actual amount from the administration for the preferred alternative.

Other items discussed in the meeting include:

- Recognition of the importance of the cruise and tourist industry.
- The private and public investment into Ketchikan (\$80 million)
- Others to contact include the Cruise Line agency, Ketchikan Dock Company and the marine pilots.
- EMS issue of having to air flight everyone out of Ketchikan
- Tenuous utility support for airport
- City's frustration with not being consulted with on the utilities

Before closing the meeting Ms. Maines reviewed the tentative schedule:

- Comment deadline August 19
- Draft of SEIS in December
- 60 day review
- 30 days for the Record of Decision

Meeting adjourned at 1:40 pm.

**ACTION ITEMS:**

- Determine level of stream survey work needed for areas north of Airport Creek and coordinate any stream work with Mark Minillo.
- Leandra Cleveland to obtain Seeley Road project and stream survey information from Mark Minillo.
- Leandra Cleveland to contact Boyd Porter and Kelly Piazza to discuss additional wildlife issues for the project.



# Meeting Notes

Subject:	Preliminary Agency Scoping Meeting		
Client:	ADOT&PF		
Project:	Gravina Access Project	Project No:	81225
Meeting Date:	June 12, 2008 – 10:00 – 11:00 am	Attendees:	Reuben Yost (DOT&PF) Bill Hanson (USFWS) Phil Schempf (USFWS) Mark Dalton (HDR) Leandra Cleveland (HDR)
Notes by: Leandra Cleveland			

**Notes:**

Reuben Yost opened the meeting by reviewing the project history and the purpose of the SEIS. The alternatives were discussed and reviewed. The new SAFETEA-LU requirements and procedures were also discussed, particularly as it pertains to the requirements for cooperating or participating agencies. The scoping notices will be sent out in mid June and will outline the cooperating and participating agency roles and requirements. USFWS will have to respond to the request within 30 days. Comments for agency scoping are due August 19<sup>th</sup>. Mark Dalton and Leandra Cleveland explained the overall project schedule.

Bill Hanson mentioned that changes have occurred in the organization of the USFWS Southeast office. There is no longer a field supervisor role and Bill and Steve Brockmann rotate in and out of that role. Currently for the Ketchikan area, Steve Brockmann is the field supervisor and Bill oversees project responsibilities. This will remain until September 1<sup>st</sup>. After that, Bill is uncertain how the roles will change but that we should not worry about it as Steve and himself will be working cooperatively on this project. Richard Enriquez is the other Ecological Services employee in the office.

Bill mentioned that if the alternatives remain the same, then the USFWS will likely have the same comments and concerns as before. The main concern is to avoid impacts to the Lewis Reef area. Bill has several questions about the SEIS.

- 1) Would the SEIS alternatives require additional roads being built? The Gravina Highway is currently under construction and should be completed by end of summer. If G2 was selected, then an additional road would be built from the ferry landing to Seley Road. As well, G2 would also require that the Seley Road be upgraded to current DOT standards. No other new roads are planned unless the alternatives change drastically.
- 2) Bill was also curious if the SEIS was linked to any Forest Service sales (like Central Gravina Timber Sales). There is no direct link. There is a possibility of upgrading the bridge at Airport Creek for the G2 alternative but that is independent of any Forest Service sales. Upgrading the bridge will be evaluated in the SEIS.

There are two major changes in Southeast since the FEIS ROD was issued in 2004. De-listing of the bald eagle and the potential listing of the Kittlitz's murrelet (currently a candidate species). Although the Kittlitz's murrelet is in southeast, there are no documented occurrences of this species in Ketchikan. Therefore the SEIS will not need to evaluate this species.

The bald eagles will need to be evaluated under the 2007 National Bald and Golden Eagle Guidelines. Unlike with ESA, the guidelines do not provide flexibility to the USFWS, such as allowing projects to occur closer than recommended to nest trees and as a mitigation measure, monitoring those nests during the construction. The thresholds in the guidelines may become a screening factor for the alternatives in the SEIS. No other listings or changes to listings have occurred or may occur that affect the SEIS. Other potential listings are for species located outside the Ketchikan area.

Phil Schempf (USFWS) was able to join the meeting to discuss bald eagle nest surveys. Phil's schedule for the summer has changed and he now has time to conduct a bald eagle nest survey for the project. HDR will provide Phil with a map of the study limits. If Phil needs assistance with the survey, HDR would be available. There was additional work completed in 2005 for the runway project that identified two additional nests but USFWS and HDR do not have that report only the nest location coordinates. Reuben will try to track that data down as it probable is with the construction office.

**ACTION ITEMS:**

- **Leandra Cleveland to provide Phil Schempf with a study area map for the bald eagle survey as well as follow up to determine if additional HDR assistance is needed.**
- **Reuben Yost will try to locate the 2005 bald eagle survey information completed for the runway safety area extension project.**



# Meeting Notes

Subject:	Preliminary Agency Scoping Meeting		
Client:	ADOT&PF		
Project:	Gravina Access Project	Project No:	81225
Meeting Date:	June 12, 2008 – 1:00 – 2:00 pm	Attendees:	Reuben Yost (DOT&PF) Mike Vanderhoof (FHWA) Erin Allee (DNR-DCOM) Carrie Bohan (DNR-DCOM) Kristen Maines (HDR) Mark Dalton (HDR) Leandra Cleveland (HDR)
Notes by: Leandra Cleveland			

**Notes:**

Reuben Yost opened the meeting by reviewing the project history and the purpose of the SEIS. The alternatives were discussed and reviewed. Reuben and Mike Vanderhoof discussed the new SAFETEA-LU requirements and procedures, particularly as it pertains to the requirements for cooperating or participating agencies. The scoping notices will be sent out in mid June and will outline the cooperating and participating agency roles and requirements. DNR-DCOM will have to respond to the request within 30 days. Comments for agency scoping are due August 19<sup>th</sup>. Mark Dalton, Leandra Cleveland, and Kristen Maines explained the overall project schedule. The alternatives evaluated in the FEIS were also reviewed.

With regards to DNR-DCOM's involvement in the project, they would certainly be part of the Corps permitting process. The project would also have to be consistent with the Coastal Management Plan updates which were revised in 2005. Erin Allee will send the current Plan and Enforceable Policies for Ketchikan to Kristen Maines.

Erin Allee will be the main point of contact for the project. Leslie Real is a local contact in Ketchikan that we may also talk to regarding the project and the Coastal Management Plan.

The only other project that Erin knew about was the new cruise ship berth in Ketchikan. There are no other projects on the radar screen.

**ACTION ITEMS:**

- **Erin Allee to send the Ketchikan Enforceable Policies and Ketchikan Gateway Borough Coastal Management Plan to Kristen Maines (received by Kristen on June 12, 2008).**



# Meeting Notes

Subject:	USFS Agency Scoping Meeting		
Client:	ADOT&PF		
Project:	Gravina Access Project	Project No:	81225
Meeting Date and Location:	June 12, 2008, 3:15 – 4:00 pm Juneau, AK (SE DOT&PF)	In Attendance:	Jim Lowell (DOT&PF), Reuben Yost (DOT&PF), Mark Dalton (HDR), Kristen Maines (HDR), Jack Oien (USFS/tel.), Mike Vanderhoof (FHWA).
Notes by:	Kristen Maines		

**Notes:**

Mark gave a brief background and history of the project.

Jim talked about the purpose of the SEIS: to include the Gravina Highway and to select another alternative because the Governor has indicated that F1 was too expensive.

Reuben mentioned that we will need to revisit all reasonable alternatives including the Gravina Island Highway as part of the analysis.

Jim said that because of the Governor's press release, cost will be the primary screening factor for the SEIS, but we are not yet sure what "the cost bar" will be set at.

Kristen mentioned that we are to kick off the project and are looking to open the lines of communication and let the USFS know what was going on. I asked who the primary POC would be.

Jack said he would be the primary POC but that we should include the Ketchikan Ranger District Supervisor on our mailing list.

Jack mentioned that the USFS plans to replace the Airport Creek Bridge and that there are timber sales planned as well as the timber sale that is underway (Seeley Mill). A condition of the timber sale permits is that the Seley road must be made available for use by others.

Jack also mentioned the KGB wants to extend Seley Road past the mill.

The timber sale DEIS is due this summer with a ROD expected this winter.

**ACTION ITEMS: Jack will email POC to timer sale EIS.** (This has taken place as of the preparation of these notes)



# Meeting Notes

Subject:	Preliminary Agency Scoping Meeting		
Client:	ADOT&PF		
Project:	Gravina Access Project	Project No:	81225
Meeting Date:	June 13, 2008 – 10:00 – 11:00 am	Attendees:	Reuben Yost (DOT&PF) Jim Lowell (DOT&PF) Mike Vanderhoof (FHWA) Nicole Hayes (USACOE) Birdie Budnik (USACOE) Kristen Maines (HDR) Leandra Cleveland (HDR)
Notes by: Leandra Cleveland			

## Notes:

Jim Lowell opened the meeting by reviewing the project history and the purpose of the SEIS. The alternatives were discussed and reviewed. The new SAFETEA-LU requirements and procedures were also discussed, particularly as it pertains to the requirements for cooperating or participating agencies. The scoping notices will be sent out in mid June and will outline the cooperating and participating agency roles and requirements. The USACOE will have to respond to the request within 30 days. The USACOE was a cooperating agency for the FEIS and Nicole Hayes expects that will be the case for the SEIS. Comments for agency scoping are due August 19<sup>th</sup>. Kristen Maines explained the overall project schedule.

Leandra Cleveland discussed the upcoming delineation field work. The field work will verify the work completed for the FEIS and make sure that the original work is consistent with the 2007 Regional Supplement. Nicole mentioned that all streams, whether in uplands or wetlands, will need to be delineated as this was not done for the FEIS. As well, all construction areas and wasting sites will need to be delineated. Nicole requested field dates and contact information in case she is able to visit during that time.

The 404(b)(1) evaluation will need to be updated for the SEIS. Per the 1992 MOA between the USACOE and DOT&PF, the final SEIS will include a draft permit application and 404(b)(1). Nicole also mentioned that the project will need to demonstrate how it meets the 2008 Compensatory Mitigation Rules in the SEIS as well as the permits. The original permit and mitigation was completed for a specific project and specific impacts. If the SEIS results in another alternative being chosen then additional mitigation would be required. Even if the new preferred alternative had similar impacts, the USACOE would still require mitigation for those impacts and it would not allow the previous mitigation to be applied.

Nicole was interested to know how additional communication with the USACOE would occur throughout the project. Following scoping, there are no official meetings with any of the agencies planned. Additional meetings will be determined by the scoping comments and as development of the project progresses. It is anticipated that meetings with the USACOE will be necessary to discuss the alternatives, screening criteria, and potential impacts and mitigation.

Nicole also mentioned that the SEIS will need to explain how the existing ferry and Gravina Highway fit with the various alternatives and meet the purpose and need of the project.

## ACTION ITEMS:

- Leandra Cleveland will provide Nicole with dates and contact information for the upcoming delineation field work.



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## **Gravina Access Project SEIS Agency Scoping Meeting**

**US Environmental Protection Agency**

**June 23, 2008**  
HDR Alaska, Inc.  
2525 C Street, Susitna Conference Room  
Anchorage, AK  
1:00 pm – 2:00 pm

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### **Agenda**

- Introduction and meeting objectives
- Review project history
- Purpose of the SEIS
- Project schedule
- Project vicinity
- Issues to be addressed in the Draft Supplemental Environmental Impact Statement
- Scoping methods (*Please note that each agency will be receiving a letter inviting them to participate and requesting written scoping comments by 8/19.*)
- Opportunities for participation
- Range of alternatives
  - Alternatives considered in original EIS
  - Alternatives screening process
  - Reasonable alternatives to be carried forward in the SEIS
- Questions related to process
- Other?

### **Questions for US Environmental Protection Agency**

1. Are there issues that should be addressed in the Draft SEIS that were not addressed in the FEIS?
2. What project specific issues are of concern to you and your agency? How would you like those issues to be addressed or evaluated?
3. Has your agency made changes to or issued new regulations or guidance since the FEIS/ROD that would affect the Draft SEIS and the evaluation of alternatives?
4. Are there new or recently proposed projects, developments, or activities involving your agency that should be considered in the Draft SEIS?



5. Does your agency have any concerns about the alternatives previously considered in the EIS?
6. Are there any new alternatives that your agency sees a need to consider?
7. Are there any specific screening criteria for the alternatives that you or your agency would like to include?
8. Is there anyone else you recommend we talk to?
9. Is there a point of contact, other than yourself, with whom we should have regular contact with concerning the project?
10. What is the best way to contact you (letter, email, fax, or phone)?
11. Are there opportunities where we can share project information with you and your organization (regularly scheduled meetings, for example)?

Subject: Agency Scoping meeting with U.S. Environmental Protection Agency	
Client: Alaska Department of Transportation and Public Facilities	
Project: Gravina	Project No: 81225
Meeting Date: June 23, 2008	In Attendance: See participant list
Notes by: Rosetta Alcantra	

**Participants:**

- Jennifer Curtis, US EPA
- Chris Meade, US EPA – teleconference
- Reuben Yost, ADOT&PF - teleconference
- Mike Vanderhoof, Federal Highway Administration – teleconference
- Mark Dalton, HDR Alaska, Inc.
- Rosetta Alcantra, HDR Alaska, Inc

The meeting began at 1:00 pm with introductions (see the participant list). Reuben Yost explained that he is the project environmental coordinator and Jim Lowell is the project manager from DOT&PF. Mike Vanderhoof is the NEPA reviewer for the FHWA. Mark Dalton is the Project Manager for the consultant team and Rosetta Alcantra is the Public Involvement Lead. Jennifer Curtis is the NEPA reviewer for the US EPA and works closely with the regional office in Seattle. Chris Meade introduced himself as the US EPA Environmental Scientist in Juneau that will be providing oversight of the 404(b)(1) guidelines.

Mr. Yost began the meeting by providing an overview of the purpose of the Supplemental Environmental Impact Statement. He reviewed the decision made by Governor Sarah Palin and the direction to look for a lower cost alternative than that selected in the final EIS. The SEIS will be looking at each of the reasonable alternatives presented in the Final EIS. Governor Palin has already indicated that the preferred alternative, F1, is not a fiscally responsible alternative. Each of the alternatives will be evaluated with the inclusion of the Gravina Island Highway, which is in the final stages of construction and should be completed in late summer.

Mr. Yost continued with the purpose and need of the project, it is to provide access to the airport, access to recreational and developable lands on Gravina Island and to facilitate development on Gravina Island.

Mr. Yost then explained that the SEIS would be handled under the guidance provided in SAFETEA-LU, where FHWA will be identifying cooperating and participating agencies. US EPA will be sent a letter inviting the agency to be a participating agency; this has been the role the agency has played in the previous studies. Under SAFETEA-LU the participating agency would provide comments on the purpose and need, range of alternatives and screening methods. There was a brief discussion of what would be part of the screening. Since the State Administration has established that F1 is too costly, an important screening factor will be cost.

Mike Vanderhoof asked Jennifer Curtis if she was familiar with the changes under SAFETEA-LU and the role of the participating agency. Mr. Vanderhoof wanted to clarify that the invitation letter would soon be going out and there is a process if the agency should decline to participate. The agency is required to decline in writing if they will not be participating and there is a 30 day time frame to do so. Mr. Vanderhoof encouraged Ms. Curtis to call either him or Reuben if she had any questions regarding the process.

Ms. Curtis explained that she works closely with Christine Reichgott, the Unit Manager for NEPA Review in the Seattle office. All correspondence should be sent to Ms. Reichgott and cc'd to Ms. Curtis.

Mr. Yost then asked Mark Dalton to explain the alternatives. Using the alternative map, Mr. Dalton reviewed each alternative. Ms. Curtis asked about what screening criteria was used in the FEIS. Mr. Dalton indicated that the criteria used included information pertaining to life cycle cost, travel time, wetlands and various other factors such as the presence of Bald Eagle nests. This is not the full list of criteria, more information can be found on the web site [www.gravina-access.com](http://www.gravina-access.com).

After the discussion on alternatives, Mr. Dalton reviewed the proposed schedule. FHWA will be sending out the scoping letters requesting that the agency be a cooperating or participating agency and also requesting comments. Comments are due August 19, 2008. Mr. Dalton suggested reviewing the comments provided for the FEIS and to review if there are any changes to incorporate into the SEIS.

Ms. Curtis said she would review the previous comments and at this point wanted to reference the impending climate change guidance from CEQ on how to address climate change. She indicated the SEIS will need to address climate change. Mr. Vanderhoof suggested that FHWA understands the need to consider climate change in NEPA documents but that such discussions at the project level are not particularly meaningful. Ms. Curtis agreed to send the EPA Headquarters guidance to the project team for consideration.

Ms. Curtis also suggested developing a fuel consumption analysis for each of the alternatives and the preparation of an assessment of the emissions that would result from each. They also suggested that we explore the availability of more energy efficient ferry technology. Ms. Curtis also expressed concern regarding the Timber sales on Gravina Island. She was informed that much of the infrastructure development for timber harvest has been constructed and the primary future timber sales are located largely on the east side of Gravina.

Chris Meade suggested the SEIS include a more thorough consideration of water quality impacts as a result of storm water management issues attributable to the existing construction activity on Gravina, both storm water management activities such as SWPPP and BMPs. Mr. Vanderhoof liked the idea of taking a better look at the issues regarding erosion and sediment control in the SEIS. Chris Meade indicated he would be reviewing the new guidance under 404(b)(1) and compensatory mitigation, now built into regulation. There was a short discussion of in lieu fees and the funding that went to the Seal Trust for wetlands affected by the F1 Alternative as a condition of the 404 permit from the US Army Corp of Engineers.

Before closing the meeting, Mr. Dalton asked Ms. Curtis if she would be able to visit the project area. She indicated at this point she did not have the budget to do a site visit. Mr. Dalton offered to send her the new photography once it is received to help her visualize the area.

The meeting adjourned at 2:10 pm.



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## Gravina Access Project SEIS Agency Scoping Meeting

U.S. Coast Guard

June 25, 2008  
Juneau, AK  
FHWA Conference Room  
3:15 PM – 4:30 PM

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### Agenda

- Introduction and meeting objectives
- Review project history
- Purpose of the SEIS
- Project schedule
- Project vicinity
- Issues to be addressed in the Draft Supplemental Environmental Impact Statement
- Scoping methods (*Please note that each agency will be receiving a letter inviting them to participate and requesting written scoping comments by 8/19.*)
- Opportunities for participation
- Range of alternatives
  - Alternatives considered in original EIS
  - Alternatives screening process
  - Reasonable alternatives to be carried forward in the SEIS
- Questions related to process
- Other?

### Questions for USCG

1. Are there issues that should be addressed in the Draft SEIS that were not addressed in the FEIS?
2. What project specific issues are of concern to you and your agency? How would you like those issues to be addressed or evaluated?
3. Has your agency made changes to or issued new regulations or guidance since the FEIS/ROD that would affect the Draft SEIS and the evaluation of alternatives?
4. Are there new or recently proposed projects, developments, or activities involving your agency that should be considered in the Draft SEIS?



5. Does your agency have any concerns about the alternatives previously considered in the EIS?
6. Are there any new alternatives that your agency sees a need to consider?
7. Are there any specific screening criteria for the alternatives that you or your agency would like to include?
8. Is there anyone else you recommend we talk to?
9. Is there a point of contact, other than yourself, with whom we should have regular contact with concerning the project?
10. What is the best way to contact you (letter, email, fax, or phone)?
11. Are there opportunities where we can share project information with you and your organization (regularly scheduled meetings, for example)?



## MEETING RECORD

DATE: 07/21/08      TIME: 3 p.m.      JOB NO.: 81225  
 RECORDED BY: WL      CLIENT: Alaska DOT&PF  
 MET WITH: Mayor Charles Denny      OF City of Saxman  
 MEETING LOCATION: Saxman City Hall, 2706 S. Tongass Ave., Saxman, Alaska  
 ROUTE TO:                      INFORMATION                      X                      ACTIONS  
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 SUBJECT OF MEETING: Gravina Access Project SEIS One-on-One Agency Scoping Meeting

### MEETING ATTENDEES

Mayor Charles Denny, City of Saxman  
 Mayor Joe Williams, Ketchikan Gateway Borough  
 Malcolm Menzies, Alaska DOT&PF Southeast Region Director  
 Jim Lowell, Alaska DOT&PF  
 Reuben Yost, Alaska DOT&PF  
 Mark Dalton, HDR Alaska, Inc  
 Wendy Longtin, HDR Alaska, Inc.

### ITEMS DISCUSSED:

The purpose of the meeting was to discuss the status of the Gravina Access Project SEIS and answer questions from Mayors Denny and Williams.

After a project status report from Malcolm Menzies, Mayors Denny and Williams asked questions about:

- F1 Alternative – Preferred Alternative from the Final EIS
- SEIS alternatives screening
- Cost thresholds
- Engineering feasibility
- Ferry service expansion
- Freight, barge access to Gravina Island
- Operation and maintenance costs and responsibilities
- Cruise ship traffic, bridge clearance
- Drive times per alternative
- Government-to-government consultation
- SEIS scoping process and new Record of Decision
- Project schedule
- Gravina Island Highway funding, budget
- Earmarks for airport expansion

Discussion at the afternoon meeting served as preparation for the evening meeting with the Ketchikan Gateway Borough Assembly and the next day's public open house meeting.

Mayor Williams said although he personally is opposed to the project; as mayor, he is supporting the project because that's what the majority of KGB residents want.

Mayor Denny said that Lee Wallace from the Organized Village of Saxman (Federally recognized tribe) has proposed a resolution opposing the project.

The meeting adjourned at 4:15 p.m. The project team will gather detailed cost information and drive times per alternatives for the evening meeting with the Ketchikan Gateway Borough Assembly.