



**Juneau Access  
Supplemental Draft Environmental Impact Statement  
(SDEIS)**

**Scoping Summary Report**

*PREPARED FOR:*

**ADOT&PF  
6860 Glacier Highway  
Juneau, Alaska 99801**

*PREPARED BY:*

**McDowell Group, Inc  
Juneau • Anchorage**

**June 2003**

# TABLE OF CONTENTS

---

<b>Introduction</b> .....	<b>3</b>
Introduction.....	3
<b>Summary of Public and Agency Comments</b> .....	<b>4</b>
Purpose and Need.....	4
Statement of Purpose and Need .....	4
Traffic Forecast.....	4
Household Survey .....	4
User Benefit Analysis.....	5
Alternatives.....	5
Range of Alternatives.....	5
Alignment .....	6
Cost Estimates .....	6
Marine Segments.....	7
Physical Environment.....	7
Wetlands .....	7
Geology.....	8
Avalanches.....	8
Noise.....	8
Biologic Environment .....	9
Wildlife.....	9
Essential Fish Habitat .....	9
Steller Sea Lions.....	10
Bald Eagles .....	10
Other Biologic Environment Scoping Issues .....	10
Social Environment.....	11
Socioeconomics and Land Use .....	11
Visual .....	12
Cultural and Historical Resources .....	13
Secondary and Cumulative Impacts .....	14
<b>Appendices</b> .....	<b>15</b>
• Public Scoping Meeting Summary Report .....	15
• Public Comments.....	15
• Agency Scoping Meeting Summary Report .....	15
• Agency and Government Officials' Comments.....	15
• Federal Register Notice of Intent to Prepare SEDIS .....	15
• Newspaper Display Ad Notice of Intent to Prepare SEDIS and Conduct Scoping Meetings, SDEIS Press Release and Public Service Announcement .....	15

## Introduction

At the request of Governor Murkowski, the Alaska Department of Transportation and Public Facilities (DOT&PF) has restarted the National Environmental Policy Act (NEPA) process for the Juneau Access Improvements project. DOT&PF has re-evaluated the June 1997 Draft Environmental Impact Statement and determined a supplemental DEIS (SDEIS) is needed. The Federal Highway Administration, the lead federal agency, has concurred with this determination.

The purpose of the SDEIS is to update the information in the 1997 DEIS and to include the results of any additional studies. More specifically, the SDEIS will:

- Comply with laws and regulations implemented since the original draft was prepared
- Update socioeconomic data and projections
- Augment technical studies using current methods
- Reevaluate previous decisions and assumptions.

Development of the SDEIS began with a public and agency scoping process. A Notice of Intent (NOI) to Prepare a Supplemental Draft Environmental Impact Statement was published in the Federal Register on February 28, 2003. An NOI and Notice of Public Scoping Meetings was published in local newspapers and distributed to interested parties. Public meetings were held in Juneau, Haines and Skagway, April 8, 9 and 10, 2003. An agency scoping meeting was held in Juneau on April 14. The goals of SDEIS scoping include:

- Updating information relevant to the need for Juneau access improvements
- Reassessing the range of reasonable alternatives identified to meet that need
- Determining the studies necessary to fully evaluate alternatives.

This report provides a summary of written comments received from the public and interested resource agencies. The summary focuses on comments received related only to scoping. It does not summarize or address the many comments submitted that only expressed support or opposition for a particular alternative.

This summary report includes SDEIS agency scoping comments received from the National Park Service, Alaska Department of Natural Resources (Office of Habitat Management and Permitting), National Marine Fisheries Service, U.S. Army Corps of Engineers, and the U.S. Fish and Wildlife Service. Comments were not received from the USDA Forest Service or the U.S. Environmental Protection Agency. For agencies not submitting comments, DOT&PF will rely on comments submitted regarding the 1997 DEIS and the 2003 agency scoping meeting summary report.

This scoping report also includes copies of all comments received from the public and agencies. Other material contained in the appendices include brief summaries of the public scoping meetings, the agency scoping meeting, the Federal Register Notice to Prepare an SDEIS, the press release, and display ads announcing intent to prepare an SDEIS and the public scoping meetings.

It is important to note that public and agency comments received as part of this SDEIS scoping process will supplement comments received following the release of the 1997 DEIS. Together, all comments received will guide the development of the scope of work for the Juneau Access Improvements SDEIS. Finally, all comments will be entered in a database and fully addressed in the SDEIS.

# **SUMMARY OF PUBLIC AND AGENCY COMMENTS**

---

## **Purpose and Need**

### **Statement of Purpose and Need**

In summary, the purpose of the Juneau Access Improvement project is to:

- Provide capacity to meet transportation demand
- Provide flexibility and improve opportunity to travel
- Reduce travel times between the communities
- Reduce state costs to provide transportation
- Reduce user cost to travel through the corridor.

### ***Public Comments***

Several scoping comments indicated that this statement of purpose biased the SDEIS toward road construction. Comments suggested that Purpose and Need should be based on safety, reliability and community/regional health, not simply direct cost and timely transportation. It was also suggested that the Purpose and Need should be revised to include improvements to the quality of life for all the affected communities. In addition, a comment was submitted that requested the Purpose and Need be expanded to include “enhanced economic benefits to the communities of Juneau, Skagway, and Haines, including benefits from enhanced cruise ship tourism, independent travelers and commercial recreation.”

A number of comments also asked for broader and more detailed analysis of need. These comments focused on fully addressing the benefits of improved access, including improved access to health care services for residents of Haines and Skagway, the benefits in terms of freight movement to and from the region (especially seafood), the cost of living benefits (especially those accruing to low-income households), and overall economic benefits associated with improved transportation infrastructure.

### **Traffic Forecast**

The 1997 DEIS included traffic forecasts for each alternative for the years 2005 through 2025. The forecast included several traffic components, such as visitors (non-Alaskans), locals/residents, recreational-related traffic, mining and other resource development traffic, and other commercial traffic.

### ***Public Comments***

Comments received regarding traffic forecasts generally asked for clearer identification of who would be using the East Lynn road, including types of vehicles (RVs, trucks, etc.) and trip purpose. Comments also asked for a clearer description of the assumptions made in the traffic forecasts.

### **Household Survey**

The 1997 DEIS included surveys of 500 randomly selected households in Juneau (350 surveys), Haines (100 surveys), and Skagway (50). The telephone survey gathered data on perceived importance of access improvements, preferred access improvement alternatives, anticipated usage for each alternative, past Lynn Canal travel frequency and purpose, concerns about the impact of access improvements, and a range of other issues.

### ***Public Comments***

Comments received on the household survey focused on the need for large enough sample sizes in Skagway and Haines to insure statistically valid data. Comments also indicated an interest in more questioning on Purpose and Need (addressing the transportation needs of residents and visitors) and the quality of life impacts of the alternatives.

### **User Benefit Analysis**

The 1997 User Benefit Analysis relied on two AASHTO<sup>1</sup>-accepted techniques for determining if proposed transportation improvements are economically justified; net present value (NPV) and benefit cost (B/C) ratio. NPV is a dollar value representing the difference between future project benefits and future project costs. B/C is the ratio between future project benefits and future project costs. Project benefits include annual reductions in user costs (including the value of frequency delays, standby time and travel time savings), maintenance costs and operations costs. Project costs include the cost to build the alternative (roads or ferries). A project may be considered economically valid if the NPV is greater than zero and the B/C ratio is greater than 1.

### ***Public Comments***

Detailed comments were received on the user benefit methodology. Concerns included the opinion that the user benefit analysis should be completely redone because the AASHTO methodology is an inappropriate tool for an assessment of the economic implications of Juneau Access alternatives. Comments also suggested that inaccurate cost data was incorporated into the analysis, the analysis was based on unrealistic traffic analysis, and the analysis contains material errors.

Other comments focused on the need to expand the economic analysis to include all costs and benefits associated with each alternative. This includes the system-wide economic impacts on the AMHS and the communities served by AMHS and the economic value of Tongass land along the proposed route left in its “pristine” condition.

Another comment suggested that “level of confidence” be associated with each key assumption made in the user benefit analysis. Presumably, based on this level of confidence, sensitivity analysis could be conducted.

Regarding the marine alternatives, it was suggested that traveler costs were understated in the original draft, and that the user benefit must include the full cost of traveler time on all ferry options and evaluate the “cost or value of the freedom to travel at will, which is lost on ferry options.”

## **Alternatives**

### **Range of Alternatives**

Alternatives carried forward in the 1997 DEIS included Alternative 1, No Build/Transportation System Management, Alternative 2, East Lynn Canal Highway, and Alternative 4, All Marine (Options A,B, C, and D). Alternatives considered and determined to be unreasonable included Alternative 3, West Lynn Canal Highway, plus an East Lynn Canal Railroad, and a Taku River Valley Highway.

### ***Public Comments***

Most of the comments concerning alternatives focused on revisiting the West Lynn Canal Highway alternative. A number of Haines residents, in particular, would like to see the West Lynn

---

<sup>1</sup> American Association of State Highway Transportation Officials.

alternative carried forward as a “reasonable” alternative. Numerous comments indicated that the West Lynn alternative was the only road alternative that would not result in major adverse economic impacts on Haines. In addition, Taku River is viewed by some residents as an alternative that can meet Juneau’s hard-link access needs without affecting Lynn Canal economies or the environment.

Based on comments received, there is apparently some uncertainty about access to Haines and Skagway, under Alternative 2, when the road is closed due to avalanches. (The 1997 DEIS includes the provision that when the road is closed, the shuttle ferry linking Haines and Skagway would be used to provide temporary service to a terminal located south of the major avalanche zones.)

Comments on the alternatives also focused on adding to the assessment of the road alternatives a road link between Haines and Skagway. Comments from Haines and Skagway expressed interest in adding this link, rather than a shuttle ferry.

One comment suggested that a train alternative should be considered in the SDEIS.

Regarding all alternatives, it was suggested that a better assessment of the reliability of each alternative was needed, including an assessment of the number of days the East Lynn Road would be closed to avalanche risks or snow removal, as well as the number of days per year ferries would be unable to operate due to adverse weather.

## **Alignment**

The 1997 DEIS included a Technical Alignment Report, which presented preliminary design plans for the East Lynn Canal Highway alternative. The report included a discussion of highway alignment, stormwater drainage, right-of-way and maintenance requirements of the route. Design criteria included 6.8-meter (22-foot) width of traveled way, 1.2-meter (4-foot) shoulder width and 10 percent maximum allowable grade. Design speed was 65 km/hr (50 mph).

### ***Public Comments***

Most of comments received regarding highway alignment focused on the Skagway tie-in for the East Lynn Highway. Under the current concept, the road would pass through the Dewey Lakes Recreation Area, a popular recreation area accessible only by trail. One comment requested computer simulations of routes into Skagway.

A Juneau resident asked that if the Taku River alternative is added, a Thane Road bypass be considered, due to potential impacts on the neighborhood.

Comments also suggested that a 30-foot total roadway width would be inadequate, and in particular, shoulder widths of 4 feet would not be wide enough for emergency pull-off. It was also expressed that many of the curves in the 1997 alignment were under the 50 mph design standard.

## **Cost Estimates**

### ***Public Comments***

The most frequently expressed concern in the SDEIS scoping process was the validity of East Lynn Canal Highway construction and maintenance cost estimates. Generally, comments expressed concern that the cost estimates were too low and that there is a need for detailed, clearly understandable cost estimates, with sensitivity analysis (and confidence levels) for key assumptions.

Detailed costs estimates for a Skagway-Haines highway were also requested.

## **Marine Segments**

Four marine alternatives were considered in the DEIS. These options were designed to augment or replace mainline ferry service between Juneau, Haines and Skagway. The high-speed ferry option considered for all marine options was an INCAT 84 meter (275 feet) wavepiercing catamaran. This vessel has a capacity of 105 vehicles and 777 passengers. It would travel at an average speed of 29 miles per hour. Travel time between Auke Bay and Haines would be approximately two and one-half hours, and slightly less than two hours between Berners Bay and Haines.

### ***Public Comments***

A number of scoping comments expressed concern about the impact of Juneau Access alternatives on the Alaska Marine Highway System overall. It was generally recognized that the Lynn Canal market contributes an important share of system-wide revenues. The impact of revenue losses associated with road construction must be addressed, according to several comments.

It was also requested that the SDEIS incorporate the ferry service recommendations presented in McDowell Group's study of Lynn Canal ferry service. That study recommended operating a fast vehicle ferry between Juneau and Haines/Skagway (a vessel similar to the 35-vehicle ferry now under construction), a shuttle ferry between Haines and Skagway, continued mainline service as warranted, and add another fast ferry as demand dictates. Related to this, it was suggested that cost data now available on fast ferry construction be included in the analysis of marine alternatives.

Other comments received included the suggestion that, for the West Lynn canal Highway alternative, only one ferry would be required on the Berners Bay to William Henry Bay link rather than the two ferries indicated in the DEIS.

Finally, it was suggested that the SDEIS consider a ferry alternative with terminals at Bridget Point and Seduction Point (south end of Haines Peninsula).

## **Physical Environment**

### **Wetlands**

The Lynn Canal study area contains approximately 28,600 acres of wetlands. Fifty-nine (59) percent of wetlands in the study area are on the east side of Lynn Canal and 41 percent are on the west side of the canal. Wetland complexes evaluated in the DEIS wetlands study rated from high to moderately low value. Three wetland complexes located in Berners Bay have the highest functional values of all the wetlands complexes potentially affected by the Juneau Access alternatives.

### ***Public Comments***

Specific comments concerning wetlands indicated that the SDEIS must include a functional assessment of potentially impacted areas, not just a delineation of location and type of wetlands. Further, it was suggested that the wetlands study should incorporate both an overview of the entire wetland area as well as looking at subsections of the wetlands that are both the most productive and impacted. Particular concern was expressed regarding the Berners Bay area and the effect of highway construction on water flow. One comment asked for clarification of the acreage affected by road construction.

### ***Agency Comments***

The Alaska Office of Habitat Management and Permitting (OHMP) expressed the opinion that the DEIS assessed wetlands function at too large a scale. As indicated in their comments on the 1997 DEIS, use of the hydrogeomorphic methodology (HGM) is recommended to assess wetlands impacts. HGM is recommended to assess individual wetlands functions that may be impacted by the project at a site-specific level.

OHMP also recommends that the wetlands mitigation options be revisited, since the number of potential mitigation opportunities has expanded since the 1997 DEIS. OHMP also recommends that the CBJ Wetlands Review Board be included in the development and review of wetlands aspects of the SDEIS.

## **Geology**

Assessment of geology in the Lynn Canal study area focused on impacts to soils, geology and potential hazards such as avalanches, landslides, earthquakes, tsunamis, and glacial outburst floods. A separate technical report was prepared on avalanche hazards associated with the East Lynn Canal Highway alternative. A detailed assessment of geologic hazards was provided in the *Juneau Access Improvements Reconnaissance Engineering Report*. The DEIS reported that Alternatives 2 (East Lynn) and 4 (All Marine) would result in negligible impacts on soils and geology.

### ***Public Comments***

Comments regarding geology focused on the need for an extensive study and greater detail in the SDEIS on the geology of both the East Lynn and West Lynn highway routes. For example, it was suggested that the SDEIS include a thorough search for and study of karst features on the west side of Lynn Canal. Similarly, another comment questioned how road construction would affect water drainage and hydrology on the west side. Other issues raised included the likelihood and effects of landslide/mudslide/mass wasting triggered by blasting.

## **Avalanches**

The 1997 DEIS Snow Avalanche Report included mapping and photographic documentation of avalanche terrain affecting the proposed highway alignment for the East Lynn Canal Highway alternative. The report also included computation of an avalanche-hazard index (AHI) along the proposed route, and comparison of the avalanche hazard level on the proposed route to avalanche hazards on existing highways in the US. The report included a general discussion of the type and level of avalanche mitigation that would be justified given the hazard level. Additional avalanche hazard evaluation work has been conducted since release of the 1997 DEIS.

### ***Public Comments***

Numerous comments were received regarding the potential avalanche hazard associated with the East Lynn Canal Highway alternative. In general, the need for a detailed report of the avalanche risks and mitigation was expressed. Details were requested, such as the percentage of time the road would be closed due to avalanche control, what will be done to prevent strandings, location of call-boxes, and specifically how avalanche control be will conducted. It was also suggested that the SDEIS assess the safety risks for drivers compared to ferry riders.

It was also requested that the SDEIS include comparative data from other avalanche prone areas, including Seward Highway and Klondike Highway, to put into perspective the risks associated with the East Lynn Canal avalanche areas.

## **Noise**

In the original DEIS six areas were analyzed to determine existing noise levels and estimate the increase that would result from the proposed alternatives. The DOT&PF Noise Policy considers a noise impact to exist if highway traffic noise levels at a receiver exceed 65dBA or the projected traffic noise levels substantially increase the existing noise levels. Only at the National Park Service Visitor Center in downtown Skagway did the existing noise level exceed 65dBA. The 2dBA increase associated with East Lynn Highway alternative would be imperceptible and the impact negligible, according to the 1997 DEIS.

### ***Public Comments***

The only comments received concerning noise focused on the potential noise impacts in Haines from East Lynn Canal Highway vehicle traffic. It was reported that on quiet days sound carries



well from the east side of the canal to Haines, and that noise tests should be conducted as part of the SDEIS.

## **Biologic Environment**

### **Wildlife**

The 1997 DEIS *Wildlife Technical Report* described existing wildlife and habitats and the potential impacts to wildlife and habitats resulting from Juneau Access project alternatives. Four Management Indicator Species were selected for detailed evaluation: brown bear, black bear, marten and mountain goat. These species were selected because they represent important game species and are sensitive to road development and disturbance.

### **Public Comments**

Scoping comments concerning wildlife generally focused on the need to broaden the analysis to include studies of impacts on other species such as deer, wolf, harbor seal, moose, trumpeter swan, and wolverines. One comment recommended increasing the number of indicator species to include at least one small mammal and one migratory nesting songbird. One person expressed the need for a comprehensive study of the population of Goshawks in the East Lynn area. Another specific comment asked for an assessment of the impact downhill of road cuts, including impacts on communities of lichens, plants and invertebrates, soil communities of lichens, fungi, plants and small animals, intertidal communities and invertebrates.

Another comment recommended that the SDEIS consider new reports released since 1997, concerning habitats and wildlife of Northern Lynn Canal and Berners Bay. Of specific interest is work that relates to the importance of eulachon runs to wildlife that inhabit Lynn Canal. Eulachon was characterized as a “cornerstone species” for Steller sea lions, Humpback whales, bald eagles, migratory shorebirds, and waterfowl. Also regarding eulachon, it was suggested that the SDEIS consider effects of oil-polluted storm water runoff on herring eggs (eulachon are related to herring) which is thought to be linked to the decline of Juneau’s herring runs.

Some public comments noted that the SDEIS should incorporate research conducted by the USFS Juneau Field Office including surveys of waterbirds, marine mammals, and human use of the Berners Bay shoreline and near-shore waters.

Comments also indicated that the SDEIS should consider the impact of ATV traffic on flatlands, as related to poaching, wildlife harassment, and cost of increased wildlife protection and enforcement.

### **Agency Comments**

The National Marine Fisheries Service (NMFS) asked that the preliminary 2003 US Fish and Wildlife Service report on wildlife and human use of Berners Bay be used to update the SDEIS. NMFS also recommended that DOT&PF coordinate with the US Forest Service to utilize information collected in the Berners Bay area for the Kensington Mine project’s current NEPA process.

### **Essential Fish Habitat**

The 1994 *Anadromous Fish and Stream Habitat Report* presented results of stream surveys conducted along the proposed Juneau Access alternatives within Lynn Canal. The report described the existing morphology of the stream systems and the existing and potential habitat for anadromous species. It also determined what anadromous species live and use the stream systems within the project area and discussed the impacts of the alternatives on fishery habitat.

### ***Public Comments***

The only comment somewhat related to essential fish habitat asked for a study of impacts of heavy metals (contained in gasoline) in the roadside environment and the impact on salmon and crab.

### ***Agency Comments***

NMFS recommends that an Essential Fish Habitat (EFH) assessment be prepared for the SDEIS.

## **Steller Sea Lions**

The *Steller Sea Lion Technical Report* provided an evaluation of the effects of Alternative 2, East Lynn Canal Highway, upon Steller sea lion haul-outs located at Gran Point and Met Point. Gran Point is a year-round haul-out and is classified by the NMFS as a Critical Habitat Area.

### ***Public Comments***

Only very general scoping comments were received concerning sea lions. One comment asked that the SDEIS incorporate all the latest studies of human impacts on sea lions. Indirectly related to sea lions, it was also suggested that the SDEIS consider effects of auto-related pollution on herring and eulachon, and therefore on sea lions.

### ***Agency Comments***

NMFS recommends that the SDEIS be updated with aerial survey and remote camera data collected for Steller sea lion haulouts along the proposed East Lynn Canal Highway route.

## **Bald Eagles**

The Juneau Access EIS study area includes over 125 eagle nests, according to a 1994 survey conducted by U.S. Fish and Wildlife Service staff. Seventy-eight (78) of those nests are along the east side of Lynn Canal and 47 are along the west side. Bald eagles and their nests are protected by the Bald Eagle Protection Act of 1940. Bald eagles are not listed as a Threatened and Endangered Species in Alaska. For state and federally funded highway projects, construction is generally avoided within 100 meters of a nest during the period March 1 through May 31. For active nests, construction activities within 100 meters (and blasting activity within 800 meters) are usually avoided until after August 31.

### ***Public Comments***

Comments regarding eagles focused on insuring in the SDEIS that the highway alignment maintain the 100-meter avoidance zone required for nests.

## **Other Biologic Environment Scoping Issues**

### ***Public Comments***

One organization asked that the SDEIS detail the pests and plants that could potentially spread to Southeast Alaska as a result of building a road along Lynn Canal, and identify precautions that will be taken (and monitoring conducted) to prevent spread of invasive species.

Concern was also voiced about what debris might be entering Lynn Canal as a result of highway construction. The opinion was offered that if debris is allowed to enter the canal, an ocean discharge evaluation is required, which will require underwater camera surveys along the route and dive surveys at "hotspots" like eel grass beds or important crab habitat.

### ***Agency Comments***

NMFS asked that information published in the updated *Marine Mammal Viewing Guideline* brochure on humpback whale approach regulations be considered for the marine alternatives in the SDEIS.

## **Social Environment**

### **Socioeconomics and Land Use**

The DEIS *Socioeconomic Effects Technical Report*, prepared in 1994, addressed the potential social and economic effects of Juneau Access improvement. The scope of the analysis included effects on local economies and industries, education, housing and real estate, local governments, health care and social services, public safety, public utilities (water, wastewater treatment, solid waste, hazardous waste, electric power), subsistence and quality of life. A separate technical report was prepared on land use in the Lynn Canal study area. That study addressed land and resources uses such as timber harvest, mineral development, recreation, commercial fishing and residential, commercial and industrial land use.

### ***Public Comments***

Residents of Haines and Skagway asked for more detailed analysis of the economic impact of the East Lynn Canal Highway alternative. Specifically, the SDEIS should provide clearer analysis of the types of businesses in those communities that could be harmed by road construction, as well as businesses that could benefit.

Haines residents expressed particular concern about the economic impact of the East Lynn Canal alternative on their community. Some residents commented that the East Lynn alternative would result in most Lynn Canal traffic bypassing Haines, harming local businesses that depend on the traffic.

Some of the specific concerns included the loss of port traffic in Skagway, with the possible replacement of Skagway as a transshipment link into the Interior. The question was asked, Will Goldbelt's plans for Cascade Point replace Skagway as a deepwater port link to the interior resulting in the loss of Skagway's role as "Gateway to the Yukon?" One comment suggests that the East Lynn Canal alternative would eliminate Skagway's "ocean-only monopoly" on access to the very popular White Pass railroad, an important consideration for the SDEIS. Related to this, concern was expressed that cruise ship traffic could be reduced if a road is built, with cruise lines choosing to bus passengers from Juneau to Skagway rather than call on Skagway directly (potential fuel savings being a reason for dropping Skagway as a port of call). Such a reduction in traffic could have significant impacts on Skagway's economy.

Numerous comments were submitted concerning the effect of the East Lynn Canal road on recreational values in the Lower Dewey Lake area, a popular recreation spot for local residents. Lower Dewey Lake is apparently the only recreational area accessible by foot with downtown area summertime noise blocked by topography.

A number of specific economic development impacts were identified for further analysis in the SDEIS. This includes how East Lynn Canal road construction could facilitate construction of a gas line to Juneau. It was also requested that the SDEIS consider benefits to Juneau contractors as they compete in the Interior construction markets (related to the East Lynn alternative). It was requested that the SDEIS examine the effect of road construction on fish shipments out of Juneau. It was suggested that the East Lynn Canal highway could add 1,200 miles to Juneau's market radius, and there could be additional benefits related to the fast ferry links to Sitka and Petersburg.

One specific scoping request asked that the SDEIS study impacts of increased sport fishing in Northern Lynn Canal (resulting from improved access from Juneau) on commercial and subsistence fishermen.

Concerns were expressed about the adequacy of the assessment of infrastructure impacts in Juneau associated with the East Lynn alternative. It was suggested that the SDEIS consider downtown traffic and parking, especially related to recreational vehicles. It was suggested that the SDEIS identify the sources of funding if infrastructure improvements are required in Juneau.

Questions about health care-related costs and benefits were raised in the scoping comments. A cost issue concerned who would pay for basic services along a new highway, including public safety and emergency medical services (EMS). If EMS service will be provided from Juneau, with only two on-duty ambulances, a East Lynn Canal highway call-out could take one out of service for several hours, potentially impacting response time in Juneau. It was noted that the SDEIS should address potential benefits, such as urgent and emergency air travel via Whitehorse, when the weather is down in Juneau. The SDEIS should also consider the health care benefits to Skagway residents, with better access to Juneau's medical care infrastructure.

It was also suggested that the SDEIS examine in greater detail the potential for increased crime in Juneau as a result of better access, especially drug-related crime.

One scoping request asked for an Environmental Justice evaluation. The concern was expressed that lower income people in Juneau, Haines and Skagway are more likely to need and use a road, because they can't afford the airfare.

Concern was also expressed about the potential impact of the East Lynn road on the reservoir for the Dewey Lake Hydro system, potentially increasing the risk of vandalism, pollution and hiker's safety. Road alignment would also cut through the middle of the planned Otter Creek hydro project, potentially exposing this project to increased construction cost, risk of vandalism and public safety issues. Together, these issues could affect the provision of low cost power to Skagway.

It was requested that the SDEIS consider in detail the impacts of road construction on existing users and uses of Berners Bay that depend on its wilderness setting. The SDEIS should consider impacts on commercial and non-commercial recreation in the bay. Further, scoping suggested that the SDEIS address impacts to existing and potential future use of the area by charter boats, skiff rental businesses, guided kayak operations, fly fishing outfitters, sightseeing boats, etc. in Berners Bay.

### ***Agency Comment***

NPS is concerned about the local economic impact of the change in Skagway's status as "end-of-the-road" to a road-side stop (associated with the East Lynn Canal Highway alternative). Additional socioeconomic studies were requested.

NPS is also concerned about impacts on recreational values in the Lower Dewey Lakes area, a popular recreation area near Skagway. The area is a trail hub with several trails running from it to Sturgill's Landing, Icy lake, upper Reid Falls, Upper Dewey Lake and Devil's Punchbowl. Some of these trails may date back to the gold rush (1897-98). NPS commented that a study of the area's past and present recreational use should be included in the SDEIS.

### **Visual**

The 1997 DEIS included a reconnaissance-level visual resource inventory of the Juneau Access project area, based primarily on the existing information and methods of the Forest Service Visual Management System. These methods were adapted where necessary to conform with Federal Highway Administration Guidelines on visual impact assessment. A limited number of visual

simulations were prepared to assist the assessment of visual impacts and to enhance public understanding of the project.

### ***Public Comments***

Most comments concerning visual impacts focused on the need for visual aids to help people picture what the East Lynn Canal Highway would look like from Skagway, Haines, from the water on small boats, from cruise ships and airplanes. It was also requested that visual aids should include developments such as gas stations, rest stops, boat haul outs, as well as accurate depictions of highway “back-slopes” and marine dumps. Related to this, it was requested that the SDEIS consider the visual impact of the road on cruise ship passengers’ experience, small-scale commercial tourism and recreational experiences in Berners Bay and Lynn Canal.

It was also requested that the SDEIS visual analysis should also include the visual experience for drivers along the East Lynn Canal Highway.

### ***Agency Comment***

NPS is concerned about the visual impact of the proposed road on the historic town of Skagway, the Park and the National Historic Landmark. NPS offered that Skagway’s pristine scenic vistas are an important part of a visitor’s experience and an asset to the community. NPS recommends that additional visual impact studies be conducted, including computer simulations showing visual impacts of the road at various locations throughout the Skagway area.

## **Cultural and Historical Resources**

Section 106 of the National Historic Preservation Act (NHPA) requires federally funded projects to consider the effects of proposed actions on properties included on, or eligible for listing on, the National Register of Historic Places (NRHP). The Skagway and White Pass Historic District (including Yukon and White Pass Railroad, a log cabin and wharf built in 1887, and the Ship Registry) is the only National Landmark in the project area. Field surveys were conducted within the Lynn Canal project area, from Echo Cove to Skagway on the east side of Lynn Canal, and from William Henry Bay to Haines on the west side. Nine areas on the east side of Lynn Canal and four on the west side have been identified as cultural and historical resources potentially eligible for the NRHP.

### ***Public Comments***

Comments suggested that the survey of a 100-meter wide strip of National Forest land along the proposed East Lynn Canal highway route does not allow a full evaluation of direct, indirect and cumulative effects of a road on cultural historic sites in the area, as required by Section 106 of the National Historic Preservation Act (NHPA). It was indicated that DOT must re-evaluated the National Historic Register eligibility of all Auk Kwaan historic sites that may be impacted by the project.

The question was also raised about how access to former village sites, burial grounds, and other culturally significant sites will be controlled.

In addition, it was noted that if the west side alternative is to be considered as a viable alternative, a complete archeological study of these features should be included.

One comment recommended that a survey for submarine archeological sites 200 feet below sea level be conducted before dumping excess road material into the canal.

### ***Agency Comments***

The proposed project is within the boundaries of the Skagway and White Pass District National Historic Landmark. The NHL boundary extends up to and includes a portion of Lower Dewey Lake Bench. A number of cultural resources could be affected, including Sturgill’s Landing Wood

Camp and Sawmill Site, the Lower Dewey Lake Dam and associated water diversion features, the remains of Kastle Kern, an early tourist area (1908-10), and historical advertisements painted on the rocks in addition to the historic Ship's Registry. NPS suggests that additional cultural resource studies be conducted to determine the location, extent, and importance of all the cultural resources located in the area.

NPS also commented that if the proposed road from Skagway to Haines is fully developed as an alternative, a full range of cultural and natural resource studies should be undertaken along the proposed road corridor.

## **Secondary and Cumulative Impacts**

### ***Public Comments***

Addressing the potential secondary and cumulative impacts associated with the East Lynn Canal Highway alternative was recommended in several comments. It was expressed that Juneau Access, Cascade Point and Kensington/Jualin, and the Cape Fox/US Forest Service land exchange, are "functionally interdependent" therefore the SDEIS must look at all direct, indirect and cumulative impacts of all these projects.

### ***Agency Comments***

The OHMP requested "rigorous" analysis of secondary and cumulative impacts to fish and wildlife resources and habitats associated with the East Lynn Canal Highway alternative. OHMP is particularly concerned about the Berners Bay area and cumulative impacts associated with highway construction and potential development at Kensington and Cascade Point.

OHMP also asked that the SDEIS include an analysis of effects on Pacific herring, which spawn in the Berners Bay area. Declines in herring populations in the Auke Bay area may be related to sedimentation, chronic oil pollution from vessels and polluted run-off. Therefore, potential effects of development in Berners bay on herring spawning and survival should be investigated.

- **Public Scoping Meeting Summary Report**
- **Public Comments**
- **Agency Scoping Meeting Summary Report**
- **Agency and Government Officials' Comments**
- **Federal Register Notice of Intent to Prepare SEDIS**
- **Newspaper Display Ad Notice of Intent to Prepare SEDIS and Conduct Scoping Meetings, SDEIS Press Release and Public Service Announcement**

