

7.0 PUBLIC AND AGENCY COORDINATION

The 1997 Draft EIS developed and implemented a consultation and coordination program according to requirements set by the NEPA and Council on Environmental Quality regulations for implementing NEPA. The purpose of the program was to ensure that the public; tribal entities; and federal, state, and local agencies were contacted, consulted, and given an adequate opportunity to be involved in the environmental analysis and Draft EIS process.

7.1 1997 Draft EIS Public and Agency Scoping

The 1997 Draft EIS detailed the public and agency coordination from the start of the reconnaissance study through the release of the Draft EIS in June 1997. Coordination with the public and agencies began during the preparation of the *Reconnaissance Engineering Study* (Lochner, 1994) in April 1993 to May 1994. In March 1994, community meetings were held at Juneau, Haines, and Skagway to solicit public comments on the proposed project. A public information office was opened in the Mendenhall Mall in Juneau in November 1994 to disseminate project information. Public and agency involvement was ongoing throughout the development of the 1997 Draft EIS and played an integral part in the development and evaluation of alternatives. The goals of the coordination were as follows:

- To inform the public and local, state and federal agencies about the need for the project
- To identify and consider values and concerns of the public and agencies
- To ensure all reasonable alternatives were identified and evaluated
- To inform the public and agencies regarding potential impacts associated with each of the alternatives under consideration
- To integrate public input and agency policy into the decision-making process
- To establish and maintain credibility of the engineering performed to determine the characteristics of each alternative and the environmental program used to assess potential impacts

7.2 2003 Notice of Intent and Scoping

A Notice of Intent to prepare the Supplemental Draft EIS was published on March 11, 2003, in Volume 68, Number 47 of the *Federal Register*. The purpose of the Notice of Intent was to notify the public, tribal entities, agencies, and local governments of the plan to prepare a Supplemental Draft EIS due to the passage of time during which some field conditions changed, new regulations were passed, new land plans were approved, and new analytical methods were developed. The Notice of Intent also solicited participation in scoping specific to the Supplemental Draft EIS.

Public scoping for the Supplemental Draft EIS was conducted in Juneau, Skagway, and Haines on April 8, 9, and 10, 2003, respectively. An agency scoping meeting was held on April 14, 2003. The public and agencies were asked to submit comments on the range of alternatives that should be studied in the Supplemental Draft EIS and the need for additional field studies or technical reports. A summary of the public and agency meetings is included in the *Scoping Summary Report* along with copies of all comments (DOT&PF, 2003b).

7.3 2003 Public Coordination

Public coordination has continued throughout the Supplemental Draft EIS preparation. The following activities were conducted to provide additional information about project development subsequent to the 2003 scoping activities.

7.3.1 Presentations

- July 25, 2003 – Chamber Lunch Presentation – Gary Paxton with an introduction overview of the EIS
- August 1, 2003 – KINY Radio AM 8:00, Juneau – Capital City Chat with Chris Burns
- October 23, 2003 – Yakoosge Daakahidi Alternative High School Presentation
- September 5, 2003 – Project update presentation in Skagway
- January 26, 2004 – International Union of Operating Engineers Local 302 in Juneau

7.3.2 Newspapers and Newsletters

- *Juneau Empire*, September 30, 2003, “My Turn” by Reuben Yost
- *Juneau Empire*, December 7, 2003, full-page project newsletter
- *Juneau Empire*, January 16, 2004, “My Turn” by Pat Kemp

7.3.3 Meetings

- April 8, 2003 – Scoping meeting in Juneau
- April 9, 2003 – Scoping meeting in Skagway
- April 10, 2003 – Scoping meeting in Haines
- January 26, 2004 – Southeast Transportation Plan (SATP) public meeting in Haines
- January 26, 2004 – SATP public meeting in Juneau
- January 27, 2004 – SATP public meeting and Juneau Access Improvements Project Informational Meeting, Skagway

7.3.4 Local Government

- May 28, 2003 – Presentation to Juneau Assembly Public Works Committee at City and Borough of Juneau (CBJ) Chambers
- June 12, 2003 – Meeting with Juneau Mayor Sally Smith, Skagway Mayor Tim Bourcy, and Haines Deputy Mayor Jerry Lapp
- July 23, 2003 – Meeting with Haines Mayor Mike Case
- June 30, 2004 – Meeting with Haines Borough Mayor Mike Case and other Haines Borough officials

7.4 2003 and 2004 Agency Coordination

The following coordination meetings were held with agencies:

- May 29, 2003 – Agency coordination meeting in Juneau to clarify issues, agree on methodology, and define required fieldwork associated with the Juneau Access Improvements Project 2003 wetland and essential fish habitat technical studies.
- June 25, 2003 – Agency coordination meeting via teleconference to clarify issues, agree on methodology, and define required fieldwork associated with the Juneau Access Improvements 2003 karst technical study on the west side of Lynn Canal.
- October 4, 2003 – Agency coordination meeting with the USFS regarding visual impacts.
- October 30, 2003 – Agency coordination meeting in Juneau to update agency representatives on the status of the Juneau Access Improvements Supplemental Draft EIS. Agency representatives were provided copies of the draft *Anadromous and Resident Fish Streams Technical Report* (Appendix P), *Alternatives Screening Report* (Appendix A), and *Comment Analysis Report* (DOT&PF, 2003c) for agency review.
- September 9, 2004 – Agency coordination meeting in Juneau with NPS representatives to discuss visual, auditory, and traffic impacts to the Skagway and White Pass District NHL.

7.5 1997 and 2003 Government-to-Government Coordination

Letters were sent to local federally recognized tribes and Native corporations inviting them to participate in the 1997 and 2003 scoping process. In compliance with the federal laws and regulations regarding cultural resources, DOT&PF sent letters to local federally recognized tribes and other Native entities inviting them to participate in the Supplemental Draft EIS process of identifying cultural properties (prehistoric and historic) and determining the effects of the alternatives on such properties. A courtesy follow-up phone call was made to each letter recipient, and interviews were held with tribal entities that expressed further interest. In August 2004, FHWA sent letters to the same Native organizations inviting them to comment on FHWA's determination of historic property eligibility for the National Register and determination of potential effects on historic properties in the Area of Potential Effect (APE).

7.6 Summary of 1997 Draft EIS Comments and Response to Comments

The NEPA requires all substantive comments received on a Draft EIS to be included in a final EIS. A final EIS must include responses to the comments, and, if changes are made to a Draft EIS because of the comments, indicate where the changes were made in the document. The Juneau Access Improvements Project *Comment Analysis Report* (DOT&PF, 2003d) serves as a public and agency comment summary. Responses to substantive comments received during the 1997 Draft EIS comment period are presented in the Supplemental Draft EIS *Responses to Comments* (Appendix V).

This report allows the public, agencies, and other organizations to see how their substantive comments were addressed in the Supplemental Draft EIS by using the “track response” tables in the report.

7.7 Summary of 2003 Scoping Comments

The following information briefly summarizes the 2003 scoping comments from Juneau, Skagway, and Haines residents and agencies. The *2003 Scoping Summary Report* (DOT&PF, 2003b) contains copies of all of the scoping comments. The *Comment Analysis Report* analyzes the substantive comments made during 2003 scoping.

7.7.1 Purpose and Need Issues

Public Comments – Several commentors indicated that they thought the statement of purpose in the Supplemental Draft EIS is biased toward road construction. A number of comments also requested broader and more detailed analysis of project 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 to 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. In addition, a comment was submitted requesting that the Purpose and Need section 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.”

7.7.2 Traffic Forecast Issues

Public Comments – Comments received regarding traffic forecasts generally asked for clearer identification of who would use the East Lynn Canal Highway, including vehicle types (RVs, trucks, etc.) and trip purpose. Commentors also asked for additional information about the assumptions made in the traffic forecasts.

7.7.3 Household Survey

Public Comments – Comments received on the household survey focused on the need for sufficiently large sample sizes in Skagway and Haines to ensure statistically valid data. Comments also indicated an interest in more information to address the transportation needs and the quality-of-life impacts of the alternatives.

7.7.4 User Benefit Analysis

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 America Association of State Highway and Transportation Officials (AASHTO) methodology is an inappropriate tool for assessing the economic implications of project alternatives. Comments also suggested that inaccurate cost data were incorporated into the analysis, the analysis was based on unrealistic traffic analysis, and the analysis contains material errors.

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.”

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

Other comments focused on the need to expand the economic analysis to include all costs and benefits associated with each alternative. This includes the systemwide 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.

7.7.5 Range of Alternatives

Public Comments – Most of the comments concerning alternatives focused on revisiting the West Lynn Canal Highway alternative. A number of Haines residents, in particular, wanted to see the West Lynn Canal Highway alternative carried forward as a reasonable alternative. Numerous comments indicated that the West Lynn Canal Highway alternative was the only road alternative that would not result in major adverse economic impacts on Haines.

In addition, some residents view Taku River as an alternative that can meet Juneau’s hard-link access needs without affecting Lynn Canal economies or the environment.

Based on comments received, some uncertainty exists about access to Haines and Skagway under Alternative 2 when the road is closed due to avalanches.

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

One commentor suggested that a train alternative should be considered in the Supplemental Draft EIS.

It was suggested that the reliability of each alternative needed to be better assessed, including the number of days per year the East Lynn Canal Highway 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.

7.7.6 Highway Alignment

Public Comments – Most of comments received regarding highway alignment focused on the Skagway tie-in for the East Lynn Canal Highway. Under the current concept, the road would pass through the Lower Dewey Lake 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.

Commentors also suggested that a 30-foot total roadway width would be inadequate, and in particular, shoulder widths of four 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.

7.7.7 Cost Estimates

Public Comments – The most frequently expressed concern in the Supplemental Draft EIS scoping process was the validity of East Lynn Canal Highway construction and maintenance cost estimates. Generally, commentors expressed concern that the cost estimates were too low and requested detailed, clearly understandable cost estimates with sensitivity analyses (and confidence levels) for key assumptions. Detailed cost estimates for a Skagway–Haines highway were also requested.

7.7.8 Marine Segments

Public Comments – A number of scoping comments expressed concern about the impact of project alternatives on the AMHS overall. Commentors stated that the Lynn Canal market contributes an important share of systemwide revenues and the impact of revenue losses associated with road construction must be addressed.

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

Other commentors suggested 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 Draft EIS.

7.7.9 Wetlands

Public Comments – Specific comments concerning wetlands indicated that the Supplemental Draft EIS 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 an overview of both the entire wetlands area and the subsections of the wetlands that are the most productive and the most likely to be impacted. Particular concern was expressed regarding the Berners Bay area and the effect of highway construction on water flow. One commentor 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 Draft EIS assessed wetlands function at too large a scale. Use of the hydrogeomorphic methodology or an alternate function analysis methodology was recommended to assess wetland impacts. OHMP also recommended that the wetlands mitigation options be revisited, since the number of potential mitigation opportunities has expanded since the 1997 Draft EIS. OHMP also recommended that the CBJ Wetlands Review Board be included in the development and review of wetland aspects of the Supplemental Draft EIS, particularly mitigation.

7.7.10 Geology

Public Comments – Comments regarding geology focused on the need for an extensive study and greater detail in the Supplemental Draft EIS on the geology of both the East Lynn and West Lynn highway routes. For example, it was suggested that the Supplemental Draft EIS include a thorough search for and study of karst features on the west side of Lynn Canal. Similarly, another commentor 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.

7.7.11 Avalanche

Public Comments – Numerous comments were received regarding the potential avalanche hazard associated with Alternatives 2 through 2C. In general, a detailed report of the avalanche risks and mitigation was requested. Commentors asked for details such as what percentage of

time the road would be closed due to avalanche control, what would be done to prevent strandings, where would callboxes be located, and how avalanche control would be conducted. It was also suggested that the Supplemental Draft EIS assess the safety risks for drivers compared to ferry riders. It was also requested that the Supplemental Draft EIS include comparative data from other avalanche-prone areas, including Seward Highway and Klondike Highway, to lend perspective to the risks associated with the East Lynn Canal avalanche areas.

7.7.12 Noise

Public Comments – The only comments received concerning noise focused on the potential noise impacts in Haines from vehicle traffic on Alternatives 2 through 2C. 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 Supplemental Draft EIS.

7.7.13 Wildlife

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 commentor 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 commentor asked for an assessment of the impact downhill of road cuts, including impacts on communities of lichens, plants, invertebrates, fungi, small animals, and intertidal communities.

Another commentor recommended that the Supplemental Draft EIS 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 it was suggested that the Supplemental Draft EIS consider the effects of oil-polluted stormwater runoff on herring eggs, which is thought to be linked to the decline of Juneau’s herring runs.

Some public comments noted that the Supplemental Draft EIS 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 nearshore waters.

Comments also indicated that the Supplemental Draft EIS should consider the impact of all-terrain vehicle (ATV) traffic on flatlands as related to poaching, wildlife harassment, and cost of increased wildlife protection and enforcement.

Agency Comments –NMFS asked that the preliminary 2003 USFWS report on wildlife and human use of Berners Bay be used to update the Supplemental Draft EIS. NMFS also recommended that DOT&PF coordinate with the USFS to utilize information collected in the Berners Bay area for the Kensington Gold Project’s current NEPA process.

7.7.14 Essential Fish Habitat

Public Comments – The only comment somewhat related to essential fish habitat asked for a study of impacts of heavy metals in the roadside environment on salmon and crab.

Agency Comments – NMFS recommended that an essential fish habitat assessment be prepared for the Supplemental Draft EIS.

7.7.15 Steller Sea Lions

Public Comments – Only very general scoping comments were received concerning sea lions. One commentor asked that the Supplemental Draft EIS incorporate all of the latest studies of human impacts on sea lions. It was also suggested that the Supplemental Draft EIS consider effects of auto-related pollution on herring and eulachon and subsequent indirect effects on sea lions.

Agency Comments – NMFS recommended that the Supplemental Draft EIS be updated with aerial survey and remote camera data collected for Steller sea lion haulouts along the proposed alignment for Alternatives 2 through 2C.

7.7.16 Bald Eagles

Public Comments – Comments regarding eagles focused on ensuring that the proposed highway alignments will maintain the 100-meter avoidance zone required for nests.

7.7.17 Other Biological Environment Issues

Public Comments – One organization asked that the Supplemental Draft EIS 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 enter Lynn Canal because 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 “hot spots” such as eelgrass 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 Supplemental Draft EIS.

7.7.18 Socioeconomic and Land Use

Public Comments – Residents of Haines and Skagway asked for more detailed analysis of the economic impact of Alternatives 2 through 2C. Specifically, commentors asked that the Supplemental Draft EIS provide clearer analysis of the types of businesses in those communities that could be harmed by road construction and the types of businesses that could benefit.

Haines residents expressed particular concern about the economic impact of Alternatives 2 through 2C on their community. Some residents commented that these alternatives would result in most Lynn Canal traffic bypassing Haines, harming local businesses that depend on the traffic.

Some of 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 commentor suggested that Alternatives 2, 2A, and 2C would eliminate Skagway’s “ocean-only monopoly” on access to the very popular White Pass Railroad. Related to this, concern was expressed that cruise ship traffic could be reduced if a road is built, because cruise lines may choose to bus passengers from Juneau to Skagway rather than to call on Skagway directly (potential fuel savings being a

reason to drop Skagway as a port of call). The concern was expressed that a reduction in traffic could have significant impacts on Skagway's economy.

A number of specific economic development impacts were identified for further analysis in the Supplemental Draft EIS. One such issue is how construction of Alternatives 2 through 2C could facilitate construction of a gas line to Juneau. Commentors also requested that the Supplemental Draft EIS consider benefits to Juneau contractors as they compete in the Interior construction markets (related to Alternatives 2 through 2C). It was requested that the Supplemental Draft EIS examine the effect of road construction on fish shipments out of Juneau. Commentors suggested that Alternatives 2 through 2C could add 1,200 miles to Juneau's market radius, and additional benefits could result from the FVF links to Sitka and Petersburg.

Numerous comments were submitted concerning the effect of Alternatives 2, 2A, and 2C on recreational values in the Lower Dewey Lake area, a popular recreation spot for local residents.

One specific scoping request asked that the Supplemental Draft EIS 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 Alternatives 2 through 2C. It was suggested that the Supplemental Draft EIS consider downtown traffic and parking, especially related to RVs. It was suggested that the Supplemental Draft EIS 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. If emergency medical service will be provided from Juneau with only two on-duty ambulances, a call-out on Alternatives 2 through 2C could take one out of service for several hours, potentially impacting response time in Juneau. It was noted that the Supplemental Draft EIS should address potential benefits, such as urgent and emergency air travel via Whitehorse, when the weather is adverse in Juneau. Commentors said the Supplemental Draft EIS 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 Supplemental Draft EIS examine in detail the potential for increased crime in Juneau because 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 cannot afford the airfare.

Concern was also expressed about the potential impact of Alternatives 2, 2A, and 2C on the reservoir for the Dewey Lake Hydro system, potentially increasing the risk of vandalism, pollution, and hiker safety. The alignment for these three alternatives would also cut through the middle of the planned Otter Creek Hydroelectric Project, potentially exposing this project to increased construction cost, risk of vandalism, and public safety issues.

It was requested that the Supplemental Draft EIS consider in detail the impacts of road construction on existing uses of Berners Bay that depend on its wilderness setting, such as commercial and noncommercial recreation. Further, scoping comments suggested that the Supplemental Draft EIS 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, and other enterprises in Berners Bay.

Agency Comment – National Park Service (NPS) is concerned about the local economic impact of the change in Skagway’s status as “end-of-the-road” to a roadside stop (associated with Alternatives 2, 2A, and 2C). 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 to 1898). NPS commented that a study of the area’s past and present recreational use should be included in the Supplemental Draft EIS.

7.7.19 Visual

Public Comments – Most comments concerning visual impacts focused on the need for visual aids to help people picture what Alternatives 2 through 2C would look like from Skagway, from Haines, from the water in small boats and cruise ships, and from airplanes. It was also requested that visual aids should include developments such as gas stations, rest stops, and boat haulouts, as well as accurate depictions of highway backslopes and marine dumps. Related to this, it was requested that the Supplemental Draft EIS 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 Supplemental Draft EIS visual analysis include the visual experience for drivers on Alternatives 2 through 2C.

Agency Comment – NPS is concerned about the visual impact of the proposed road on the historic town of Skagway, the Klondike Gold Rush NHP, and the Skagway and White Pass District NHL. NPS commented 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.

7.7.20 Cultural and Historical Resources

Public Comments – Comments suggested that the survey of a 100-meter-wide strip of National Forest land along the proposed route of Alternatives 2 through 2C does not allow for 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. It was suggested that DOT&PF must re-evaluate the NRHP 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 Lynn Canal Highway 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 NHL. The historic landmark’s 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 to 1910); 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.

7.7.21 Secondary and Cumulative Impacts

Public Comments – Addressing the potential secondary and cumulative impacts associated with Alternatives 2 through 2C was recommended in several comments. It was expressed that Juneau Access Improvements Project, the Cascade Point and Kensington/Jualin projects, and the Cape Fox/USFS land exchange are “functionally interdependent” and therefore the Supplemental Draft EIS 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 Alternatives 2 through 2C. 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 Supplemental Draft EIS 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 runoff. Therefore, potential effects of development in Berners bay on herring spawning and survival should be investigated.

7.8 Cooperating Agency Review

After the 2003 scoping meetings, draft technical reports were distributed to cooperating agencies and state agencies with jurisdiction or expertise for review and comment. These comments were incorporated into the revised technical reports. In August 2004, cooperating agencies were requested to review the preliminary Supplemental Draft EIS. Their comments and DOT&PF responses are included at the end of this chapter.

7.9 Relevant Correspondence Involving Local Government, Federal And State Agencies, And Organizations

Relevant correspondence related to issues other than scoping is provided at the end of this chapter.