



Juneau Access Improvements Supplemental Environmental Impact Statement Scoping Summary Report

**Prepared for:
Alaska Department of Transportation
& Public Facilities
6860 Glacier Highway
Juneau, AK 99801-7999**

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List of Acronyms

ACF.....	Alaska Class Ferry
ADEC.....	Alaska Department of Environmental Conservation
ADF&G.....	Alaska Department of Fish and Game
ADNR.....	Alaska Department of Natural Resources
AMHS.....	Alaska Marine Highway System
CBJ.....	City and Borough of Juneau
CEQ.....	Council on Environmental Quality
CFR.....	Code of Federal Regulations
CWA.....	Clean Water Act
DOT&PF.....	Alaska Department of Transportation and Public Facilities
EFH.....	Essential Fish Habitat
EIS.....	Environmental Impact Statement
FEIS.....	Final Environmental Impact Statement
FHWA.....	Federal Highway Administration
FVF.....	Fast Vehicle Ferry
JAI.....	Juneau Access Improvements
LRTP.....	Long Range Transportation Plan
LUD.....	Land-Use Designations
NEPA.....	National Environmental Policy Act
NMFS.....	National Marine Fisheries Service
NOI.....	Notice of Intent
O&M.....	Operation & Maintenance
ROD.....	Record of Decision
SEIS.....	Supplemental Environmental Impact Statement
SSR.....	Scoping Summary Report
TLRMP.....	Tongass Land and Resource Management Plan
USACE.....	United States Army Corps of Engineers
USCG.....	United States Coast Guard
USEPA.....	United States Environmental Protection Agency
USFS.....	United States Forest Service
USFWS.....	United States Fish and Wildlife Service

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Executive Summary

Introduction

In 2006, the Federal Highway Administration (FHWA) issued a Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Juneau Access Improvements (JAI) project. Alternative 2B (East Lynn Canal Highway to Katzehin, with shuttles to Haines and Skagway) was the selected alternative. A 2009 U.S. District Court decision ruled that the FEIS was not valid because it did not consider an alternative that would improve surface transportation in Lynn Canal by utilizing existing Alaska Marine Highway System (AMHS) assets. This ruling was upheld by the U.S. Court of Appeals for the Ninth Circuit in 2011.

Therefore, the FHWA and the Alaska Department of Transportation and Public Facilities (DOT&PF) are preparing a Supplemental Environmental Impact Statement (SEIS) for the JAI project. The SEIS will fully evaluate the impacts of the court-ordered alternative (now designated as Alternative 1B), in addition to updating information on the seven reasonable alternatives evaluated in the FEIS, including: No Action (Alternative 1), East Lynn Canal Highway to Katzehin with marine shuttles to Haines and Skagway (Alternative 2B), West Lynn Canal Highway (Alternative 3), and four marine alternatives that would construct new ferries specifically for the Lynn Canal corridor (Alternatives 4A-D). The SEIS will also address changes in current conditions, laws, and regulations since the FEIS was published.

Scoping is defined as “an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action” (40 Code of Federal Regulations [CFR] 1501.7). Council on Environmental Quality (CEQ) Guidance also states that “[t]he scoping process should identify the public and agency concerns; clearly define the environmental issues and alternatives to be examined in the EIS including the elimination of non-significant issues” (CEQ 1983).

Although the FHWA requires scoping as part of an EIS in order to identify significant issues to be addressed in the development of the document, 23 CFR 771.130(d) states that formal scoping is not required for an SEIS. In this instance, FHWA, in collaboration with DOT&PF, decided to conduct focused scoping for the JAI project to address only those changes or new information that are the basis for preparing the SEIS and were not included in the 2006 FEIS.

This JAI project Scoping Summary Report (SSR) has been prepared to document the scoping activities conducted to solicit input from the public and agencies, to document and summarize comments received, and to define the key issues that will be examined in the SEIS. Section 1 of this SSR includes the project background, a description of the alternatives that will be evaluated in the SEIS, and the purpose of scoping activities.

Scoping Activities

FHWA and DOT&PF conducted scoping for the JAI project SEIS during January and February 2012 to obtain input from agencies and the public on the new Alternative 1B, updated FEIS reasonable alternatives, and new information about the project area. Section 2 of this SSR

describes the activities, methods, and materials utilized to conduct scoping for agencies and the public. These included the Notice of Intent published in the *Federal Register*, newspaper advertisements and an informational insert, development of a project mailing list, a newsletter and postcard, agency meetings, and web site postings.

Section 3 summarizes comment correspondences received from agencies and the public during the scoping period. A total of 185 pieces of correspondence were received from state, federal, and local agencies and the public. Within these comment correspondences, a total of 1,283 distinct issues were identified; 1,171 were from the public, and 112 from agencies. As a result of scoping, a wide range of issues were identified. Issues that were mentioned most frequently included transportation reliability and safety, fish and wildlife concerns, construction costs, operation and maintenance (O&M) costs, geotechnical constraints (such as rock falls and avalanches), convenience and reliability of service, and socioeconomic effects.

Scoping comments will be used to determine the issues to be addressed in the SEIS. All substantive scoping issues will be addressed in the Draft SEIS once appropriate analysis is conducted.

1. Introduction

The Federal Highway Administration (FHWA) and the Alaska Department of Transportation and Public Facilities (DOT&PF) are preparing a Supplemental Environmental Impact Statement (SEIS) for the Juneau Access Improvements (JAI) project. The purpose and need for the JAI project is to improve surface transportation to and from Juneau within the Lynn Canal corridor that will:

- Provide the capacity to meet transportation demand in the corridor
- Provide flexibility and improve opportunity for travel
- Reduce travel times between the communities
- Reduce State costs for transportation in the corridor
- Reduce user costs for transportation in the corridor

1.1 Project Background

This project to improve the surface transportation to and from Juneau within the Lynn Canal corridor has been ongoing since the 1990s. FHWA issued a Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the JAI project in 2006. A 2009 U.S. District Court decision ruled that the FEIS was not valid because it did not consider an alternative that would improve surface transportation in Lynn Canal utilizing existing Alaska Marine Highway System (AMHS) assets. This ruling was upheld by the U.S. Court of Appeals for the Ninth Circuit in 2011.

As a result, a SEIS is being prepared that will fully evaluate the impacts of the court-ordered alternative (Alternative 1B), in addition to updating information on the seven reasonable alternative evaluated in the FEIS, including: No Action (Alternative 1), the East Lynn Canal Highway to Katzeihin with marine shuttles to Haines and Skagway (Alternative 2B), the West Lynn Canal Highway (Alternative 3), and four marine alternatives that would construct new ferries specifically for the Lynn Canal corridor (Alternatives 4A–D). The SEIS will also address changes in current conditions, laws, and regulations since the FEIS was published. The project area is shown in Figure 1-1 (see page 6). A detailed description of the alternatives to be evaluated in the SEIS is provided below.

1.2 Project Alternatives

The JAI SEIS will evaluate the following alternatives:

Alternative 1: No Action. This alternative is based on the Malaspina and subsequently the new Alaska Class Ferry (ACF) operating between Juneau and Haines/Skagway daily in summer. In winter, shuttle service between Juneau, Haines, and Skagway would be provided a minimum of three times per week by a combination of the LeConte, Fairweather, or the new ACF. The No Action Alternative also includes approximately two mainline vessel round trips per week through Lynn Canal (originating in either Bellingham or Prince Rupert) in summer and one per week in winter. This is essentially a continuation of existing 2012 service. The new ferry is scheduled to join the fleet in 2017. No new capital improvements would be designed specifically for Lynn Canal.

Alternative 1B: Enhanced Service with Existing AMHS Assets. Alternative 1B is distinct from Alternative 1 (No Action). While the No Action Alternative reflects existing and planned service based on AMHS efforts to optimize the use of AMHS ferries considering all routes and users, Alternative 1B focuses on improving service in the Lynn Canal corridor specifically. This alternative would retain and utilize the Malaspina after its planned replacement is placed in service. Alternative 1B would approximately double summer service in Lynn Canal by deploying both the Malaspina and the Fairweather.

Alternative 2B: East Lynn Canal Highway to Katzeihin, Shuttles to Haines and Skagway. This alternative would construct the East Lynn Canal Highway from Echo Cove to a point north of the Katzeihin delta, with shuttle ferries providing service from a Katzeihin terminal to both Haines and Skagway. The ACF would provide shuttle service from Katzeihin to Skagway, and a new conventional monohull shuttle would operate on the Katzeihin to Haines route. In summer, another new shuttle would operate between Haines and Skagway, while in winter this connection would be through the Katzeihin terminal. Mainline ferry service would end at Auke Bay.

Changes to Alternative 2B since the 2006 FEIS: Minor alignment and design changes have been incorporated into Alternative 2B due to advanced geotechnical studies, permitting activities, and new eagle nests.

Alternative 3: West Lynn Canal Highway. This alternative would extend Glacier Highway to Sawmill Cove with new terminals constructed at Sawmill Cove and William Henry Bay. Two new conventional monohull shuttle ferries would be constructed to operate between Sawmill Cove and William Henry Bay. A highway would be constructed from William Henry Bay to Haines via Pyramid Island, connecting to Mud Bay Road. A new shuttle ferry would provide service between Haines and Skagway. Mainline ferry service would end at Auke Bay.

Alternatives 4A, 4B, 4C, and 4D: Marine Alternatives. Each of the four marine alternatives would provide new shuttle ferry service in Lynn Canal. All of these alternatives involve point-to-point shuttle service with no intermediate stops. A new Haines-Skagway shuttle is included in each alternative. All options would require construction of a new double stern berth at the Auke Bay terminal. These options are based on continuing approximately two mainline vessel round trips per week in summer and one per week in winter, similar to mainline service under the No Action Alternative.

Alternative 4A: Fast Vehicle Ferry (FVF) Service from Auke Bay.

- Construct two new fast vehicle ferries to provide twice a day summer service from Auke Bay to Haines and Skagway.
- In winter, a single FVF would provide one trip between Juneau and Haines and one trip between Juneau and Skagway each day.

Alternative 4B: FVF Service from Berners Bay.

- Extend Glacier Highway to Sawmill Cove in Berners Bay.
- Construct a ferry terminal at Sawmill Cove.
- Construct two new fast vehicle ferries to provide four trips per day from Sawmill Cove to

Haines and two trips per day to Skagway in the summer. In winter a single FVF would provide daily service from Auke Bay to Haines and Skagway.

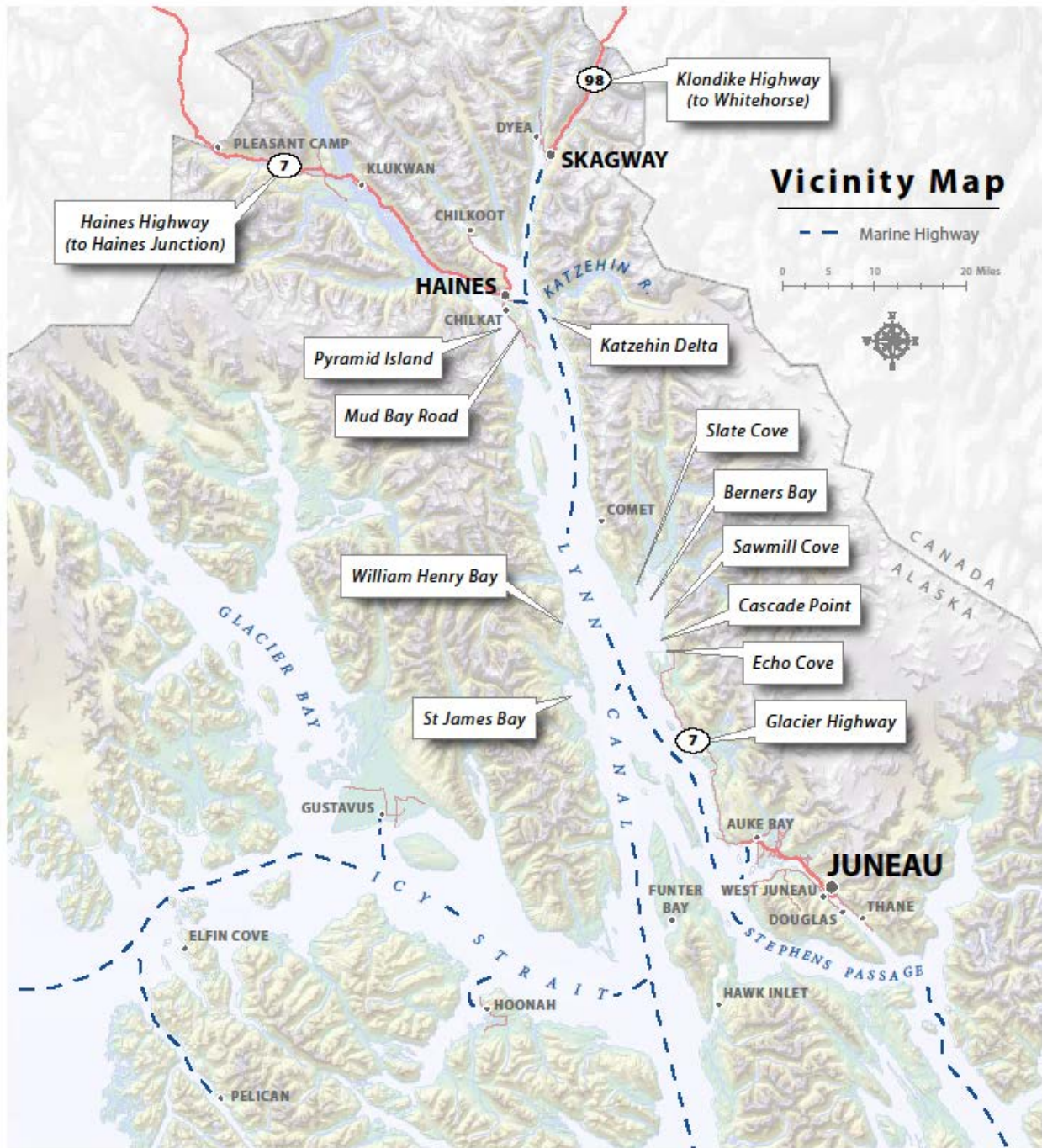
Alternative 4C: Conventional Monohull Service from Auke Bay.

- Utilize two conventional monohull shuttles to provide daily summer service from Auke Bay to Haines and Skagway. One of the shuttles would be the new ACF; the second shuttle would be a new ferry.
- In winter, a single shuttle would alternate between running one day to Haines and one day to Skagway.

Alternative 4D: Conventional Monohull Service from Berners Bay.

- Extend Glacier Highway to Sawmill Cove in Berners Bay.
- Construct a ferry terminal at Sawmill Cove.
- Construct two new conventional monohull shuttles to provide twice-a-day service from Sawmill Cove to both Haines and Skagway in the summer. Alternating day service from Auke Bay to Haines and Skagway would be provided in the winter.

Figure 1-1: Project Area



1.3 Purpose of Scoping

Scoping is defined as “an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to the proposed action” (40 Code of Federal Regulations [CFR] 1501.7). Council on Environmental Quality (CEQ) Guidance also states that “[t]he scoping process should identify the public and agency concerns; clearly define the environmental issues and alternatives to be examined in the EIS including the elimination of non-significant issues” (CEQ 1983).

FHWA requires that a formal scoping process be conducted for an EIS in order to identify significant issues to be addressed in the development of the document; however, 23 CFR 771.130(d) states that formal scoping is not required for a SEIS. In this instance, FHWA, in collaboration with DOT&PF, decided to conduct focused scoping for the JAI project to address only those changes or new information that are the basis for preparing the SEIS and were not included in the 2006 FEIS.

This Scoping Summary Report (SSR) has been prepared for two primary purposes:

- To provide a comprehensive, chronological record of the scoping process that took place during the scoping period.
- To report the results of the scoping process, including identification of issues to be addressed in the SEIS.

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2. Summary of Scoping Activities

FHWA and DOT&PF conducted scoping for the JAI SEIS during January and February 2012 to obtain input from agencies and the public on the new Alternative 1B, updated FEIS reasonable alternatives, and new information about the project area.

2.1 Notice of Intent

An important step of the SEIS process is to notify the public and government agencies of FHWA's intent to prepare an SEIS. On January 12, 2012, FHWA began this process by publishing a Notice of Intent (NOI) in the *Federal Register* to formally announce the initiation of the JAI SEIS (*Federal Register*, Volume 77, Number 8, 1973). The NOI summarized the project background and purpose and need, listed the alternatives to be studied, described scoping plans and materials, and announced the intent to hold Cooperating Agency scoping meetings. A copy of the NOI can be found in Appendix A: Scoping Materials.

2.2 Agency Scoping

Agency scoping was conducted through telephone contacts and conferences, letters, and individual agency meetings. During the scoping process, 13 federal, state, and local agencies were invited to participate by submitting written comments and were provided an opportunity to attend meetings with project staff to discuss the JAI SEIS (Table 2-1).

In addition, FHWA identified possible Cooperating Agencies; a Cooperating Agency is defined as an agency with jurisdiction by law or special expertise regarding the proposed action. On January 17, 2012, FHWA sent a letter to the following six federal agencies inviting their participation as Cooperating Agencies in the JAI SEIS, offering a project meeting opportunity, and requesting scoping comments:

- National Marine Fisheries Service (NMFS)
- United States Army Corps of Engineers (USACE)
- United States Coast Guard (USCG)
- United State Environmental Protection Agency (USEPA)
- United States Forest Service (USFS)
- United States Fish and Wildlife Service (USFWS)

Each of these invited agencies served as Cooperating Agencies for the previous EIS¹.

DOT&PF sent a memorandum to the following three state agencies on January 18, 2012, inviting them to submit scoping comments on the JAI SEIS, along with an offer for a project meeting opportunity:

- Alaska Department of Environmental Conservation, Division of Water, Wastewater Discharge Authorization Program (ADEC)
- Alaska Department of Fish & Game, Habitat Division (ADF&G)
- Alaska Department of Natural Resources, Division of Mining, Land & Water (ADNR)

¹ To date, the USEPA, USACE, and USFS have agreed to continue as Cooperating Agencies.

In addition, DOT&PF contacted the managers of the following local governments by telephone to advise them of the initiation of the JAI SEIS, answer questions, and offer a project meeting opportunity:

- City and Borough of Juneau (CBJ)
- City and Borough of Sitka
- Haines Borough
- Municipality of Skagway Borough

Scoping meetings were conducted with five federal agencies between February 1 and February 14, 2012. A scoping meeting was conducted with ADEC on February 2, and a scoping meeting with CBJ department heads was held on February 7, 2012. Scoping comments were received from 10 federal, state, and local government representatives throughout February and March. Table 2-1 summarizes scoping activities with federal, state, and local government representatives.

Table 2-1: Federal, State, and Local Government Representative Participation in Scoping

Agencies	Meeting Date	Scoping Comment Letter Received
NMFS	February 14, 2012	March 27, 2012
USACE	February 13, 2012	March 29, 2012
USCG	-	-
USEPA	February 9, 2012	February 21, 2012
USFS	February 1, 2012	Feb 17, 2012 / March 1, 2012
USFWS	February 1, 2012	February 28, 2012
ADEC	February 2, 2012	-
ADF&G	-	March 5, 2012
ADNR	-	-
City and Borough of Juneau	February 7, 2012	February 29, 2012
City and Borough of Sitka	-	February 17, 2012
Haines Borough	-	February 27, 2012 / February 29, 2012
Municipality of Skagway Borough	-	February 29, 2012

Meetings included the presentation of a project overview, summary of key agency issues in regard to the 2006 FEIS, post-ROD updates (regulatory and requirement changes, data updates, new permitting requirements, etc.), an agency status discussion, information exchange, updated issues discussions, and summary of next steps.

Appendix C contains federal, state, and municipal scoping comment documents, correspondence, and meeting materials.

2.3 Public Involvement Activities and Materials

Between January 12 and February 20, 2012, a variety of tools and activities were used to inform,

as well as to solicit and obtain input from state and federal agencies and the public. These tools included newspaper advertisements and an informational insert, development of a project mailing list, a newsletter and postcard, and web site postings.

Following is a description of the methods and how they were implemented.

2.3.1 Newspaper Display Advertisements

Newspaper display advertisements were published in four newspapers: *Juneau Empire*, *Sitka Sentinel*, *Skagway News*, and *Chilkat Valley News* (Table 2-2). These are the primary newspapers in or near the project area. The display ads announced the initiation of the JAI SEIS for the project, public scoping schedule, web site address, and the point of contact to submit comments. A copy of the display ad can be found in Appendix A.

Table 2-2: Newspaper Ad Publication Schedule

Publication Date	Newspaper	Total Circulation
January 15, 2012	<i>Juneau Empire</i>	7,500
January 17, 2012	<i>Sitka Sentinel</i>	2,500
January 18, 2012	<i>Skagway News</i>	900
January 19, 2012	<i>Chilkat Valley News</i>	1,200

2.3.2 Newsletter/Newspaper Insert

The initiation of the JAI SEIS was also introduced through a newsletter/newspaper insert published in January 2012. The publication was designed to announce scoping, provide project and alternatives information, and solicit comments (Table 2-3). The publication was distributed as a newspaper broadsheet insert in locally distributed copies of the *Juneau Empire* (5,200 inserts), *Sitka Sentinel* (2,500 inserts), *Skagway News* (600 inserts), and *Chilkat Valley News* (1,000 inserts; total newspaper inserts: 9,300). The publication was also mailed as a newsletter to individual box holders in Skagway, Haines, Juneau, the Chilkat Valley (Haines and Klukwan), and Sitka (approximately 24,000 residential box holders). The two publications (insert and newsletter) are identical in content; however, the folding configuration was modified to fit requirements of the newspapers. The newsletter (reformatted for printing and online readability) was also posted on the project web site. A copy of the reformatted newsletter/insert is included in Appendix A.

Table 2-3: Newsletter/Insert Topics

Volume and Publication Date	Purpose	Topics
Newsletter 1 January 2012	<ul style="list-style-type: none"> • Announce focused scoping process • Provide information on the SEIS Alternatives • Provide options for ways to be involved in the project • Provide information on the project timeline 	<ul style="list-style-type: none"> • SEIS is initiated • SEIS alternatives to be addressed • Project area (vicinity map) • Request for scoping comments • Contact information • Schedule

2.3.3 Project Mailing List

The DOT&PF Southeast Region Special Projects Office manages, updates, and maintains the project mailing list. The initial project mailing list was comprised of individuals, state and federal agencies, and organizations that were engaged in the 2006 FEIS. The list includes 340 Southeast Alaska residential addresses and 54 residential addresses outside of Southeast Alaska.

The scoping notice, newsletter, and web site explained that members of the public, agencies, and organizations can request to have their names added to the mailing list at any time during the JAI project SEIS process through a number of ways, including the following:

- Project web site
- Comment forms
- Sign-in sheets (at public meetings)
- Response to newspaper ads

The project mailing list is updated regularly.

2.3.4 Postcard

On January 26, 2012, DOT&PF mailed 394 postcards to the JAI project mailing list. The purpose of the postcard was to announce the initiation of the JAI project SEIS and its intent, share the project web site address, provide project contact information, and request that the recipient return the “reply” postcard with comments and/or requesting to remain on the project mail list. Recipients mailed reply cards to the DOT&PF Southeast Region office in Juneau; 10 were received with project comments. Copies of the postcard and reply card are included in Appendix A; copies of the reply cards that were returned with comments are included in Appendix B (Table of Document Numbers with Issue Categories and Coded Public Scoping Comments).

2.3.5 Web Site

The web site for the 2006 FEIS was revised to include the updated information pertaining to the JAI SEIS. The web site (www.juneauaccess.alaska.gov) is maintained by the DOT&PF Southeast Region Special Projects Office. The web site address was included in all project scoping material (postcards, newspaper advertisements, and newsletter/newspaper insert). The

site provided the following information:

- Juneau Access Improvements home page
 - Information on project Purpose and Need
 - Project status
 - Project timeline
 - Project overview
 - “What’s New” section featuring project updates (such as the opening of the public comment period)
- Project Resources
 - Project Documents:
 - 2012 SEIS documents (newsletter, NOI, comment form)
 - 2009 Cost Report
 - Permits and Approvals
 - Financial Plans
 - 2006 Geotechnical Report
 - Record of Decision
 - 2006 FEIS, figures, and appendices
 - 2005 SDEIS, figures, appendices, and related documents
 - 2005 SDEIS scoping and related documents
 - Maps and Photos (current maps and an archive of previous maps and photos)
 - Submit Comments (online form to submit electronic comments)
 - Contact (contact information for project information manager)

The web site was updated with scoping materials as they were completed and with project updates as they occurred. Screen shots of web site pages can be found in Appendix A.

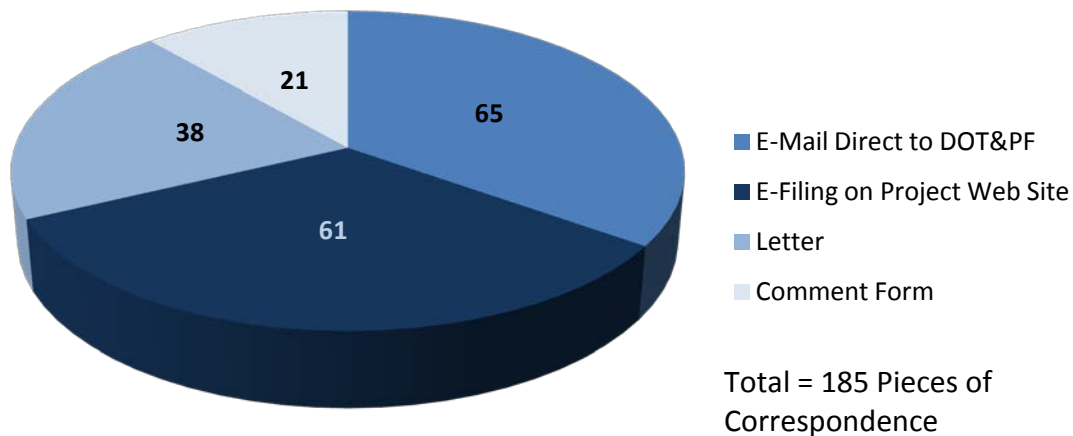
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3. Comments Received During Scoping

During the JAI SEIS scoping period of January 18, 2012 through February 20, 2012, agencies and the public were invited to comment and ask questions on topics such as alternatives, environmental concerns, issues, and evaluations.

A total of 185 individual pieces of correspondence were received from state, federal, and local agencies and the public. Comments were received in the form of e-mail, mailed or faxed letter, printed comment form, and web site e-filing. A breakdown of these comment document types is shown in Figure 3-1. The majority of comments came via e-mail or through the project web site (e-filing). Copies of all 185 original pieces of correspondence can be found in Appendix B (Table of Document Numbers with Issue Categories and Coded Public Scoping Comments) and C-3 (Coded Federal, State, and Municipal Scoping Comments).

Figure 3-1: Types and Numbers of Comment Correspondence Received



Comments originated from various communities around the state, although the majority of comments came from communities nearest to the project area. Table 3-1 shows the origin of the comments received.

Table 3-1: Comment Breakdown by Community

City	Number
No address provided	18
Anchorage, AK	3
Auke Bay, AK	4
Craig, AK	1
Douglas, AK	6
Gustavus, AK	1
Haines, AK	50
Homer, AK	1
JBER, AK	1
Juneau, AK	72
Ketchikan, AK	1
Sitka, AK	7
Skagway, AK	26
Total	191*

**This number reflects the fact that there was more than one author on some correspondence. For instance, one letter may have been signed by several people. A total of 185 pieces of correspondence were received.*

3.1 Scoping Comment Document Categories

All scoping comments received were recorded in a tracking database. This database is a searchable program used specifically to track large numbers of comment documents. All correspondence was logged into the database, which allowed comment documents to be sorted by individual, issue, origin, etc. All comment documents received are presented, in their entirety, in Appendix B (Table of Document Numbers with Issue Categories and Coded Public Scoping Comments) and Appendix C-3 (Coded Federal, State, and Municipal Scoping Comments).

Upon receipt, each comment document was assigned a unique identification number or “Document Control Number,” logged into the database program, and then coded to identify unique issues within the comment document. Document Control Numbers for each comment document can be found in Appendix D-1 (Document Control Number Key Sheet). It is important to note the vernacular of the database used to organize the scoping comment documents and issues. For the purpose of clarity, a scoping *comment document* refers to a physically submitted document collected by the project. Comment documents were received in the form of e-mail, letter, printed comment form, and electronic submission from the project web site.

Most comment documents addressed multiple *issues* that spanned the scope of the project. Each comment document received was read, and each distinct *issue* within that comment document was coded by primary *issue category* and one or two *issue subcategory* levels, as applicable.

In some cases, comments referred to an alternative by a general term such as “the road” or “ferries.” If there was sufficient information in the comment to determine with reasonable

certainty that it was in reference to a specific alternative, it was categorized as such. Otherwise the comment was categorized as “general road” or “general marine ferry alternative.” The primary issue categories are shown in Table 3-2; most of the primary issue categories had a level of subcategories, such as “Alternative 2B/Threatened and Endangered Species,” and “Alternative 2B/Evaluation.” In some cases, issues that were more complex were also broken down to a third level of categories to capture the detailed nature of the issue (e.g., “Alternative 2B/Evaluation/Cost”). A complete list of issue coding categories is included in Appendix D-2 (Scoping Issue Count by Category, Sub-Category, and Sub-Sub-Category).

In cases where multiple authors signed/submitted the comment document, the individual issues were logged for each author.

3.2 Issues Identified During Scoping

A total of 1,282 unique issues were identified within the scoping comment documents—1,170 from the public and 112 from agencies. Issues that were mentioned most frequently included transportation reliability and safety, fish and wildlife concerns, construction costs, operation and maintenance (O&M) costs, geological constraints (such as rock falls and avalanches), convenience and reliability of service, and socioeconomic effects. The primary issue categories that generated at least 25 issues are featured in bold in Table 3-2 and are displayed in Figure 3-2.

Table 3-2: Issue Count by Primary Issue Category

Primary Issue Category	Issue Count
Alternative 1 - No Action	37
Alternative 1B	70
Alternative 2B	257
Alternative 3	84
Alternative 4A	41
Alternative 4B	40
Alternative 4C	41
Alternative 4D	33
Alternatives	157
Construction Impacts	4
Cost Analysis	2
Cultural Resources	1
General Marine Ferry Alts	235
General Project	8
General Road	212
Government-to-Government Consultation	1
Land Use	1
Marine & Anadromous Fish & Shellfish	1
Marine & Freshwater Habitat Including EFH	4
Permitting	4
Project Description	1
Project Support	3

Primary Issue Category	Issue Count
Purpose & Need	27
Socioeconomic Resources	1
Threatened & Endangered Species	3
Transportation	2
Wildlife	12
Total	1,282

Note: Categories in **bold** are those that generated least 25 issues; they are displayed in Figure 3-2.

Figure 3-2: Most Frequently Raised Primary Issue Categories

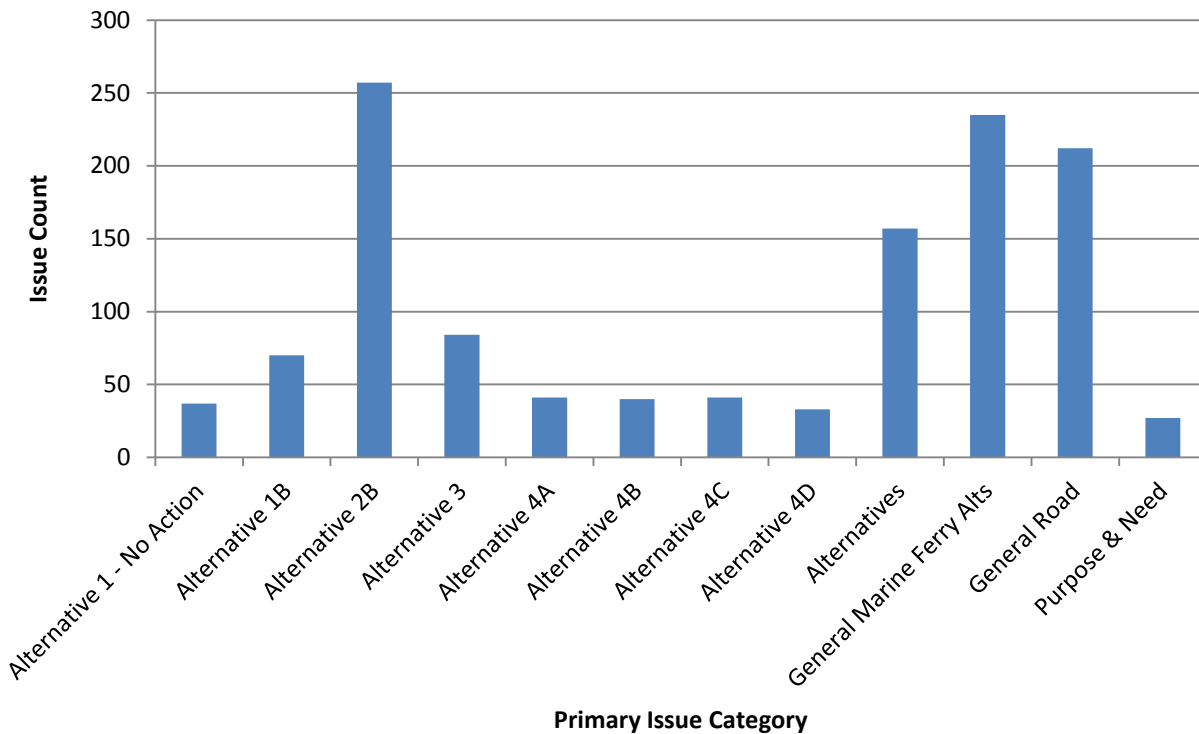


Table 3-3 lists each of the primary issue categories and subcategories for which the most issues were received, with those issues summarized. A paraphrased overview of all issues identified and coded can be found in Section 3.3, Overview of Comments and Issues. For the full, original text of all issues received and coded, please see Appendices B (Table of Document Numbers with Issue Categories and Coded Public Scoping Comments) and C-1 (Coded Federal, State, and Municipal Scoping Comments).

Table 3-3: Most Frequently Identified Issues by Category and Subcategory

Issue Category and Subcategory	Summary of Issues from Scoping Comment Documents
Alternative 1- No Action	
Support (for stated reasons)	Comments stated that the current system functions well and that funds allocated for the maintenance of the road would be better spent on reducing ferry costs for local residents.
Against (for stated reasons)	Comments against this alternative stated that it is inconvenient, restrictive, slow, and expensive.
Evaluation	Comments recommended that the AMHS make necessary management and vessel changes (conventional ferries) to keep the existing service a viable transportation option. Having FVFs operate once or twice daily in the upper Lynn Canal was also recommended.
Alternative 1B	
Support (for stated reasons)	Comments supporting this alternative described it as reliable, having improved service, and convenient. It was stated that this alternative would make best use of the existing system without additional high costs. Comments suggested that funds spent on the maintenance of roads proposed under other alternatives be reallocated toward lowering travel costs for local travelers. It was recommended that DOT&PF resources and assets be rededicated to address the transportation needs of the region, which could greatly enhance access to and from Juneau with very little additional cost. Federally funded Alaska Class Ferries, monohull designs, and existing terminal infrastructure were supported.
Against (for stated reasons)	Reduced AMHS service and redeployment of ferries were the main topics of concern noted against this alternative. Additionally, comments stated that the ferry would not meet the project purpose and need or transportation needs, and that it would not be a practical or effective mode of transportation. Some comments stated that high operation and maintenance costs, lack of reliability, and restrictive schedules would make this an undesirable alternative.
Alternative 2B	
Support (for stated reasons)	Supporting comments expressed that this alternative would be an economically feasible approach to provide reliable, lower cost travel opportunities for Southeast Alaskans. Comments stated that this alternative would best meet the project purpose and need by providing the best combination of improvements in both capacity and convenience, while also reducing long-term costs to the user and the state through lower O&M costs. Comments also stated that this alternative would provide socioeconomic benefits not only in Juneau, but in the entire southeast region, including improved economic activity and recreation area accessibility.
Against (for stated reasons)	Comments received focused primarily on safety and reliability, with concerns about geotechnical restraints, such as rock falls and avalanche hazards that would lead to road closures. Construction and maintenance costs of a new road, as well as added costs to travelers as a result of the road closures, were additional concerns expressed. Environmental impacts to Berners Bay ecosystem also were noted as of concern.

Issue Category and Subcategory	Summary of Issues from Scoping Comment Documents
Alternative 3	
Support (for stated reasons)	Comments stated that ferry-road alternatives reflect a more economical overall capital expenditure, with lower maintenance and operation costs. Comments described this alternative as more flexible and reliable when compared to the ferry schedule. It would improve the connection between Juneau and the continental highway system by reducing travel time and cost, while providing capacity and opportunities to the traveler. With improved access this alternative would provide positive socioeconomic impacts to the tourist industry, small businesses, outdoor recreation, and other industries in the southeast.
Against (for stated reasons)	Construction and maintenance costs associated with the new road, exacerbated by geological constraints such as avalanches, were concerns expressed in comments received. Additional comments stated that this alternative would not be reliable due to winter road closures, and the environmental impacts on fish and wildlife would be too great to justify its construction. Safety concerns associated with crossing Lynn Canal at William Henry Bay during bad weather conditions were also expressed. Comments suggested a transportation cost analysis to accommodate walk-on passengers with publicly and/or contracted services.
Alternative 4A	
Support (for stated reasons)	Supporting comments stated that this alternative would hold more vehicles and be able to operate in adverse weather conditions. Some cited the creation of jobs as a positive aspect. Others felt it would provide the best access and optimum efficiency, and that FVFs would give faster service.
Against (for stated reasons)	One key issue against this alternative was inconvenience to the AMHS traveler, as it involves vessel routes that do not stop at all Lynn Canal communities. There were also concerns that it would necessitate building new vessels to access previously underserved communities, adding unnecessary capital and operation costs. Additionally, comments noted that this alternative would not allow unrestricted economical access to Alaska's capital city, while some communities would have improved access at the expense of other communities. This would necessitate building new vessels to provide direct links between communities, adding unnecessary capital and operation costs. Concerns were expressed about the lack of plans to provide public transportation from the new terminal at Berners Bay to Juneau. It was also stated that fast vehicle ferries would be unreliable in winter.
Alternative 4B	
Against (for stated reasons)	Comments recommended that a more in-depth study be performed of the new ferry terminal at Sawmill Creek regarding effects to birds, fisheries, and wildlife. Additionally, concerns were expressed about effects to fish and wildlife in Berners Bay. Others felt that the new facilities and roads in this alternative were too costly, and that travelers without vehicles would be inconvenienced. Some commenters mentioned unsafe and undependable road conditions. It was also noted that this alternative would favor some communities at the expense of others, and would generally involve vessel routes that do not stop at all Upper Lynn Canal communities. This would necessitate building new vessels to provide direct links between communities, adding unnecessary capital and operation costs.

Issue Category and Subcategory	Summary of Issues from Scoping Comment Documents
Alternative 4C	
Support (for stated reasons)	Commenters felt that this alternative seems to serve the community in accommodating the tourist trade as well as meeting the needs of the community year-round as well as the tourist trade. Some indicated that the alternative's monohulls would be sturdier, more reliable, and safer in adverse weather conditions.
Against (for stated reasons)	Comments indicated that the new facilities and roads in this alternative were too costly in terms of capital costs as well as operations and maintenance. Some commenters mentioned unsafe and undependable road conditions. It was also noted that this alternative would favor some communities at the expense of others, and would involve vessel routes that do not stop at all Upper Lynn Canal communities. This would necessitate building new vessels to provide direct links between communities, adding unnecessary capital and operation costs.
Alternative 4D	
Support (for stated reasons)	Some comments felt that Alternative 4D would be the best because of its use of stronger, more reliable monohull ferries. Additionally, comments noted the more economical costs of using monohulls as opposed to FVFs.
Against (for stated reasons)	Comments recommended that a more in-depth study be performed of the new ferry terminal at Sawmill Creek regarding effects to birds, fisheries, and wildlife. Additionally, concerns were expressed about effects to fish and wildlife in Berners Bay. Others felt that the new facilities and roads were too costly, and that travelers without vehicles would be inconvenienced. Some commenters mentioned unsafe and undependable road conditions. It was also noted that this alternative would favor some communities at the expense of others, and would involve vessel routes that do not stop at all Upper Lynn Canal communities. This would necessitate building new vessels to provide direct links between communities, adding unnecessary capital and operation costs.
Alternatives	
Evaluation	Comments focused primarily on evaluation topics such as safety, cost analysis, financial feasibility, transportation connections and cost, agency consultation, environmental and wildlife concerns including essential fish habitat (EFH), threatened & endangered species (T&E), marine and freshwater habitat, bald eagles, geotechnical concerns, and purpose and need. Additional issues included new alternatives, alternatives considered but eliminated, alternatives screening process relying on the USACE Section 404(b)(1) Guidelines, transportation needs, and comments under the Tongass Land and Resource Management Plan.
Construction Impacts	
General, Invasive Plants, Native Plants, O&M	Comments noted concern about fish and wildlife impacts; recommendations to prevent spread of invasive species, post-construction planting, and use of insecticides, mowing, and herbicide. It was also noted that pilings, while expensive, could be utilized to cross Berners Bay without fill, thus avoiding negative effects to fish.
Cost Analysis	
General	Comments asked for an analysis comparing costs to ferry passengers versus costs to drivers. Comments requested that analysis focus on the cost to the state and the user, more than the total cost.

Issue Category and Subcategory	Summary of Issues from Scoping Comment Documents
General Marine Ferry Alternatives	
Support (for stated reasons)	Supporting comments stated that a primary marine alternative would be a more cost-effective and beneficial alternative to the entire Southeast region, providing safe and reliable service. Marine alternatives were considered the most cost-effective and beneficial with continued or improved ferry service. Additionally, comments stated that monohull ferries were safer than Fast Vehicle Ferries for the Lynn Canal conditions.
Against (for stated reasons)	Concerns were raised relating to the cost imposed on travelers, as well costs for operations and maintenance of ferries. Ferries were deemed too slow, infrequent, and unreliable. Safety concerns were raised about fast ferries being unreliable in heavy weather. A terminal location at Berners Bay would make a marine alternative inconvenient; it was recommended that the terminal location remain at Auke Bay.
General Project	
Evaluation	Comments recommended that the project be consistent with regulations and that it meet the public disclosure requirements of NEPA.
General Road	
Support (for stated reasons)	Comments supporting this alternative stated that the road would be more cost-effective, less restrictive, and would offer more reliable access for citizens and tourists in comparison with ferries, resulting in socioeconomic benefits.
Against (for stated reasons)	High construction and maintenance road costs, especially in winter because of geotechnical restraints such as avalanche zones and steep terrain, were concerns expressed in comments. A considerable topic of concern was safety and reliability under unstable winter conditions due to avalanche zones and steep terrain. Environmental concerns such as sensitive habitat impacts, wildlife displacement, fish habitat, and eagle nests were also expressed. Comments on transportation connections and costs raised concerns about the terminal location being placed farther away than its current location. This would lead to an increase in travel time and expenses, requiring additional transportation options, vehicle storage, and accommodations if ferry connections were not made.
Marine & Freshwater Habitat Including EFH	
General	Comments requested discussion with DOT&PF about aquatic study sites being surveyed for the Coeur Alaska, Inc. mining project; recommended that FHWA consult with ADF&G to obtain up to date information on project area fish habitat; suggested using/upgrading existing development sites rather than new development to reduce impacts to birds and marine mammals.
Permitting	
General	Comments discussed guidelines under USACE Section 404, and Section 404(b)(1) evaluation.
Project Support	
Convenience	Comments noted that surface transportation should be more convenient between different communities in the southeast.
Cost	Comments desired that surface transportation should be less expensive.
Socioeconomic	Comments stated that construction of Lynn Canal road is necessary for southeast Alaska to survive economically and sociologically.

Issue Category and Subcategory	Summary of Issues from Scoping Comment Documents
Purpose and Need	
General	Comments recommended that criteria (i.e., improving public transportation safety and transportation reliability, promoting economic sustainability, minimizing environmental impact, and level of community support) be included in the purpose and need. There were also comments stating that the criteria used for the purpose of the project are faulty and lead inevitably to the improper conclusion that building a road is the only way to meet the transportation needs of Lynn Canal.
Safety & Reliability	Comments recommended including safety and reliability into the purpose and need for the project. The general impression is that without a safety and reliability assessment, Juneau access could actually decrease.
Socioeconomic Resources	
General	Comments expressed concerns that the Juneau Access EIS focuses unfairly on one community at the expense of others in Southeast Alaska and fails to recognize the importance of Lower 48 and Prince Rupert ferry routes. Additionally, comments noted that habitat degradation in Berners Bay and Lynn Canal from road construction will have an adverse economic effect on tourism and fishing.
Threatened & Endangered Species	
Consultation	Comments asked that FHWA reinitiate consultation with NMFS concerning species listed under the Endangered Species Act (ESA), to determine whether the project may affect a listed species or critical habitat. Additionally, Section 7 consultation under the ESA was also recommended.
Wildlife	
Bald Eagles	Comments received regarding bald eagles recommended that new nest surveys should be performed and impacts on eagle nesting should be clearly identified in the EIS and mitigation measures be put in place.

3.3 Overview of Comments and Issues

The following sections provide a paraphrased overview of public and agency comments. These sections are included only to give a broad overview of the types of feedback received in comment documents; they are not intended to provide exhaustive details or specifics regarding all issues. The full context of all coded issues can be found in the original coded comment documents contained in Appendices B (Table of Document Numbers with Issue Categories and Coded Public Scoping Comments) and C-3 (Coded Federal, State, and Municipal Scoping Comments).

For a complete breakdown of all comment document issues by origin, types, and categories, please see Appendix D-3 (Scoping Issues by Category, Sub-Category, and Sub-Sub-Category). A complete list of issue coding categories is included in Appendix D-2. Appendix D-1 includes the Document Control Number Key Sheet so that agencies or individuals who provided comments can identify their unique number and track the comment documents they submitted. All text from the comment documents was entered into the database verbatim; therefore, the reader may see misspellings or grammatical errors in Appendix D-3.

As previously explained, the purpose of scoping is to identify issues to be addressed in the SEIS. Unexplained statements of support or opposition do not identify an issue and are not paraphrased below.

3.3.1 Alternative 1 – No Action

Alternative 1 – No Action / Support (for stated reasons)

- The quality and uniqueness of our lives in Southeast Alaska are best served by focusing on improvements in the existing ferry system.
- If a new ACF cannot be funded and built to keep service balanced between Lynn Canal and other communities, then I would support Alternative 1.
- I would support this alternative with a new FVF operating once or twice daily between Juneau, Haines, and Skagway.
- If ferry ridership is not expected to increase much, I support Alternative 1.
- I strongly favor option 4C or option 1 with the only disadvantage of option 4C being the apparent lack of service between Skagway and Haines in the winter.
- I support Alternative 1, but would recommend building a new vessel that includes staterooms and cafeterias as opposed to the Alaska Class Ferry.

Alternative 1 – No Action / Against (for stated reasons)

- This access needs to be replaced. It is very restrictive, expensive, slow, and inconvenient.
- Considering replacing this transportation mode only with other marine methods is a very expensive mistake.

Alternative 1 – No Action / Evaluation

- The No-Action alternative should be given serious consideration as well.

3.3.2 Alternative 1B

Alternative 1B / Support (for stated reasons)

- It makes sense to economize on public transportation costs by improving the marine highway instead of building a new road.
- This alternative seems okay, but it needs a daily run in the winter, and the Taku should not turn around in Juneau.
- I need the cost/benefit information for 1B, 4A, and 4C before I make a final decision.
- This alternative would work if passenger and vehicle traffic warrants it, but my observations of current demand indicate that there might be a lot of empty space on days with two ferries.
- This alternative makes the best use of an existing system that has been successful for years.
- If improved access is such a pressing issue, then the solution that improves it in the shortest amount of time for the least cost is the most sensible.
- I also support the fare reduction included in this alternative as a means to increase use, but am not certain the additional service is necessary at this point in time.
- Ferry travel is safe, reliable, and—with improved service—convenient.
- This alternative might benefit by including some elements from alternatives 4A and/or 4C.

- I support this alternative with one caveat: it cannot include scheduling FVFs during winter months.
- We might support Alternative 1B or 4C with more study given to fuel efficiency and impacts to wildlife.

Alternative 1B / Against (for stated reasons)

- It is a temporary, short-term solution that is the result of poor legal decisions.
- This is not a viable alternative because it is just a redeployment of portable assets that can be redirected by the administration or elected bodies at will.
- It adds service to Lynn Canal at the expense of the other ferry routes in Southeast Alaska.
- Ferry service as the sole method of public surface transportation cannot meet project purpose and need or the long-term transportation needs of the Lynn Canal corridor.
- FVFs cannot handle the weather in Lynn Canal and have too many maintenance issues.
- The severe limitations in capacity and scheduling, plus rising fuel and O&M costs, will always cause the ferries to be less desirable than road links.
- Moving the FVF to Lynn Canal would seriously reduce the level of service between Sitka and Juneau; ridership on slower vessels will be reduced due to increased travel time.

Alternative 1B / AMHS System Analysis

- This alternative needs to meet the needs of Lynn Canal travelers without negatively impacting other Southeast Alaska ferry services.
- Existing legacy boats could be utilized during peak travel times to keep an FVF from being taken out of service on the Sitka route.
- Other vessel deployment options should be explored, and a comprehensive vessel operation matrix should be created.

Alternative 1B / Evaluation

- We applaud DOT's willingness to explore improving current ferry service using existing infrastructure and consider increasing the efficiency of service routes through innovations.
- It is possible we would support this alternative if more study is given in the SEIS to fuel efficiency and impacts to wildlife.
- The project should analyze the efficiencies of existing vessels regarding passenger and vehicle capacity, crew costs, fuel efficiency, and maintenance requirements in the context of actual demand to find the optimum vessels for this alternative.

Alternative 1B / Ferry Design

- I request that the state find the optimum vessel configuration to meet transportation needs in the Lynn Canal.

Alternative 1B / Schedule

- Provide strategic and efficient scheduling options.

Alternative 1B / Service

- This alternative provides the service we have been asking for.
- This alternative allows freedom of movement in both directions and will increase ridership.

- I do not understand how the new service frequency would differ from existing service, what an “existing” asset is, or how you will keep from reducing service to some areas.
- Given its periodic scheduled maintenance service gaps, how will the Malaspina make increased sailings?

3.3.3 Alternative 2B

Alternative 2B / Support (for stated reasons)

- Juneau desperately needs access to the road system for economic progress, retaining the capital, and providing residents with affordable travel and recreation opportunities.
- A road would provide easier access to the recreational opportunities of Berners Bay, making a fantastic area accessible to all residents.
- Gaining access to Haines or Skagway would be acceptable if a commuter ferry was proposed from this point onward.
- Alternatives 2B and 3 are the only economically viable alternatives for those in Southeast Alaska.
- We need to reduce our dependency on the ferries and build a road that will be a cost-effective way to get to the Interior or the Lower 48.
- It is time to move this project forward to provide reliable lower cost travel for Southeast Alaskans; increased costs due to delays are strangling the region’s growth.
- The road will be one of the best long-term investments the state can make for future generations.
- Having roads where we are able to build them, connected by shuttle ferries, would give us more versatile access and be cheaper than our present system.
- When the Juneau airport is closed down, a drive to Whitehorse could probably get you a flight; Whitehorse airfield isn’t often closed.
- Only this alternative can provide long-term stability to the AMHS system while injecting substantial economic activity into the region.
- The Lynn Canal Highway would reduce travel costs because it is much cheaper to transport a vehicle on a highway than on a ferry.
- This alternative would be more convenient and less expensive for visitors to Alaska.
- This reflects a more economical overall capital expenditure and a lower O&M cost.
- State budgets will decline with oil production and we cannot afford the escalating costs of current ferry service.
- Fuel will be conserved.
- Existing ferries can be used elsewhere to support Bush communities.
- The City and Borough of Juneau (CBJ) comprehensive plan encourages transportation links.
- I like to travel when I am ready and I do not have that option with the present marine routes.
- This would give greater flexibility in case of a major disaster in Juneau.
- This option appears to give the shortest ferry distance.
- The focus should be providing service to communities that cannot be connected by roads.

- The road would increase the economic viability of the region, and thereby increase the population.
- This alternative best meets the purpose and need of the project.
- Juneau needs access to grow, and having a larger tax base would mean lower property taxes and cost of living.
- I want the ability to take my family on a short trip without paying several hundred dollars.
- This will bring more diversity and job opportunities to Juneau.
- This alternative might allow Haines to expand our overfilled small boat harbor and have some fuel sales competition.
- I agree with Governor Parnell and his commitment to Roads to Resources projects.

Alternative 2B / Against (for stated reasons)

- This alternative will impact the environment both physically and visually; construction and increased public access will cause wildlife degradation.
- The current road would not support the increased use that would come with the access road; it should be widened, and the maintenance and policing increased. These costs have not been considered.
- Termination of mainline service at Auke Bay would cause complex travel and lodging problems for those going to and from Lynn Canal and Auke Bay.
- The road extension increases demands on the DOT&PF O&M budget.
- A new ferry terminal 50 miles from Juneau will be inconvenient, unsafe in winter, and will cause problems for travelers.
- The previous EIS implied that the proposed mountain road would be kept clear in winter; this is magical thinking and the issue must be addressed responsibly in the SEIS.
- The previous EIS was biased in favor of the East Lynn Canal Road.
- The Golder Associates geotechnical report is valuable because it shows the severity of the terrain, indicating that the east side of Lynn Canal is not a realistic place to build a road.
- The major avalanches in the area make this project very costly and impossible to maintain.
- The EIS should realistically assess the avalanche dangers and the state's limited ability to control them or mitigate their effects. It should consider concrete snow sheds and rescue shelters in the road design, as well as a detailed road closure policy and rescue plan.
- This alternative does not meet safe and reliable transportation criteria.
- Forget any type of road link; doing so would end the waste of state and federal dollars on what will be an economical and environmental quagmire.
- I support only displacement-hull marine access alternatives between Upper Lynn Canal and Juneau.
- Juneau Access does not address an alternative for walk-on ferry passengers. If a private transportation service is assumed, costs should be studied and addressed.
- This will take a large percentage of revenue away from the AMHS.
- I have serious concerns about the road's socioeconomic impacts to Skagway.
- An east side highway would be labor intensive for routine and incident-related maintenance,

and it is too far from emergency services in Juneau and Haines.

- This will negatively impact the Berners Bay ecosystem.
- The east side road will scar the scenery and be detrimental to cruise traffic views.
- This road is not needed; we already have AMHS and air taxis, which are a rich part of Southeast Alaska's history and future.
- I am concerned about the effects of road access on fish and wildlife, as well as salmon and herring spawning habitat.
- A lot of students travel to and from sporting events in Haines-Skagway-Juneau and beyond; this presents safety concerns that have not been addressed.
- The Northern Terminus will be at a significant sea lion haulout; if it can't be stopped, save the haulout by changing the terminal area.
- The road would be closed an estimated 34 days during winter, and DOT has yet to analyze how much more it would be closed due to the hazards identified in the 2006 report.
- The proposed road phasing seems like a desire to provide subsidized access for mining companies to the gold belt north of Berners Bay.

Alternative 2B / AMHS System Analysis

- If this alternative is implemented, estimate the future required state subsidy for AMHS, the impacts on the rest of the region, and the resultant loss of traffic and revenue in Lynn Canal.

Alternative 2B / Cost

- This alternative would help make Juneau more economically accessible.
- Adding hourly shuttle service with fast load/unload capabilities to and from Katzehin would enhance travel to and from Juneau.
- Alternative 2B would cut costs for mineral exploration and extraction, as well as travel costs for gillnetters.
- Eliminating ferry service to Haines would save the state and federal governments tens of millions of dollars annually.

Alternative 2B / Cost Analysis

- I request a realistic cost assessment for this alternative based on the new geotechnical information that suggests a need for snow sheds, tunnels, and retaining walls.
- Consider the costs and logistics of police and rescue on the new road.
- DOT omitted the true total cost to travelers by not addressing the cost of getting to and from the Katzehin Ferry Terminal.
- DOT underestimated the costs of building and maintaining a safe highway on the east side of Lynn Canal; these costs should be reflected in the SEIS or the alternative should not be supported.

Alternative 2B / Evaluation

- This alternative presents huge safety problems not at issue with the marine ferry alternatives.
- The geotechnical studies done by Golder Associates in December 2006 show extensive technical difficulties and hazards associated with road construction and operation.

- While there are engineering and design solutions available that may make the route reasonably safe, the SEIS must disclose and analyze their costs.
- The agencies must take a hard look at the costs of maintaining the proposed road throughout the winter.
- Hire an independent consultant to review the results of the Golder contract and any other geotechnical or engineering work that would impact construction costs of the road link.
- The FEIS assumes no wait time in the travel time calculations for this alternative; this is bad science and poor methodology. A 45-minute wait time should be attributed to this alternative.
- This alternative effectively dismantles a mass transit system with historical precedent; what are the legal consequences? Has there not been federal mass transit money invested in the marine highway before?
- How can you say that walk-ons are not your responsibility when they constitute 45% of the current customer base?
- Reassess East Lynn Canal Road closures for the avalanche paths in the context of recent 5-year road closure numbers for the Klondike Highway. Include avalanches and reasonably foreseeable winter closures to determine potential closures.
- The Golder Associates 2006 geotechnical report results should be incorporated into the SEIS, particularly their estimate of road closures due to 112 geological hazards.
- Estimate how many Katzehin ferry crossings between Haines and Skagway would be cancelled due to high wave or wind conditions in Lynn Canal. Analyze whether building a breakwater at the Katzehin terminal would help.
- Assess routine and emergency health care issues for Haines and Skagway residents in the context of anticipated East Lynn Canal road closures.

Alternative 2B / Ferry Design

- DOT's unfamiliarity with tourism traffic patterns in Northern Lynn Canal has led to miscalculations regarding vessel design capacity and scheduling.
- This alternative does not consider the numerous combinations of passenger/vehicle types that occur.

Alternative 2B / Ferry Terminal Design

- More closely analyze the Katzehin River delta as a terminal location because the accumulated silt may not provide a firm foundation, and its exposure to wind and waves would probably require a breakwater.
- Increased public access from the Comet Beach terminal could result in travelers overnighting in tents and vehicles; designated parking and camping areas would reduce environmental impacts.

Alternative 2B / Ferry Terminal Location

- All three unmanned, unsecured terminals are potential terrorism targets and create homeland security concerns.
- A ferry terminal at Comet Beach is preferable to other nearby locations such as Slate Cove and Berners Bay, and its impacts could be avoided or minimized through BMPs.
- Analyze the potential for seasonal terminal closures due to exposure, particularly if the

terminal is used beyond summer only; recommend conversations with Coeur Alaska's ferry contractor.

- The SEIS should describe the temporary/permanent nature of the Comet terminal and plans to decommission or maintain the terminal after the road to Katzehin is completed.
- Describe the rationale for the Comet Ferry Terminal construction timeline and the planned actions to minimize impacts of pausing and resuming construction activities.
- An interim "summer" ferry terminal at Comet should not be constructed because it will be temporary and costly; DOT&PF should consider a temporary or permanent public-private ferry terminal at the existing Kensington Mine facility.

Alternative 2B / Ferry Terminal Operations

- Proposed facility operations for all three terminals eliminates staff and most services, yet traffic estimates indicate that they will handle more traffic than the Auke Bay terminal. This is unlike all other AMHS Class A or B terminals.
- Mooring a ferry in Lynn Canal's year-round adverse weather and high winds is of additional concern for all three terminals.

Alternative 2B / Financial Feasibility

- Given that 23 CFR 450.216(m) states that a project or project phase may be included in a STIP only "if full funding can reasonably be anticipated to be available for the project within the time period contemplated for completion of the project," analyze the legality of building this alternative when the major portion of construction would occur "in a second phase when funding becomes available."

Alternative 2B / Funding Source

- If state funds are used for this project, will it affect funding of other state projects? Will Americans support an expensive project connecting a small city to a ferry terminal in the middle of nowhere? The EIS must contain a definite plan for funding this project.

Alternative 2B / Geotechnical

- Review the December 2006 Geotechnical Report and perform a realistic determination of East Lynn Canal road closures based on the discovery of 112 geological hazards and 36 avalanche paths.
- Provide a realistic cost estimate of the East Lynn Canal road based on geotechnical information that suggests the need for snow sheds, tunnels, and retaining walls.
- Discuss the progress and scope of Phase II geotechnical work for this alternative.

Alternative 2B / Legality

- This alternative dismantles a mass transit system with historical precedent; what are the legal consequences? Has there not been federal mass transit money invested in the marine highway before?
- How can you defend the statement that walk-ons are not your responsibility when they constitute 45% of the current customer base?
- Given that 23 CFR 450.216(m) states that a project or project phase may be included in a STIP only "if full funding can reasonably be anticipated to be available for the project within the time period contemplated for completion of the project," analyze the legality of building

this alternative when the major portion of construction would occur “in a second phase when funding becomes available.”

Alternative 2B / Marine & Anadromous Fish & Shellfish

- Road realignment could negatively affect fish habitat.

Alternative 2B / Mineral Exploration

- The road would cut costs for mineral exploration and extraction.

Alternative 2B / Mining

- Initial construction should conduct Phase I work from Cascade Point to the Kensington Mine area in Slate Creek Cove. A road to this area would improve access to the mine, with access safety as a benefit.

Alternative 2B / O&M Cost

- The current road must be widened to support the increased use from an access road, which would require more maintenance and policing. Such costs have not been considered.
- Include in your analysis ferry operation and terminal costs associated with the hard link preferred alternative.
- Eliminating ferry service to Haines would save the state and federal governments tens of millions of dollars annually.

Alternative 2B / Permitting

- Given the impact to the watershed from building a highway through Berners Bay, the compensatory mitigation approved in 2008 for this project is inadequate.
- Disclose the “approved” In-Lieu Fee program that the agencies intend to utilize to mitigate impacts from this project and evaluate appropriate mitigation options.
- Provisions to limit human access to Berners Bay should be included in permitting requirements and/or proposal planning.

Alternative 2B / Phasing

- Initial construction should conduct Phase I work from Cascade Point to the Kensington Mine area in Slate Creek Cove.

Alternative 2B / Recreational

- The road would open up vast new recreation areas and would increase Juneau’s RV potential and Haines’ winter sports business.
- Tour and Pax [passenger?] bus service is a possibility.

Alternative 2B / Safety

- Consider the costs and logistics of police and rescue on the new road.
- A road to this area would improve access to Kensington Mine, with access safety as a benefit.

Alternative 2B / Schedule

- Overly simplistic analysis of real time traffic patterns will lead to bottlenecks at the Skagway, Haines, and Katzechin terminals.
- DOT’s unfamiliarity with tourism traffic patterns in Northern Lynn Canal has led to

miscalculations regarding vessel design capacity and scheduling.

Alternative 2B / Service

- Hourly shuttle service with fast load/unload capabilities to and from Katzehin would enhance travel to and from Juneau.
- Expensive and untimely ferry connections at Haines create a huge bottleneck in the system.
- This alternative could revolutionize surface travel to and from Juneau.

Alternative 2B / Socioeconomic

- Consider the potential economic loss to Haines from an east Lynn Canal Road, including the drain on businesses from the big box stores in Juneau.
- Haines residents would benefit from access to Juneau's needed services.

Alternative 2B / Threatened & Endangered Species

- The FHWA should initiate early consultation with the National Marine Fisheries Service because this alternative will cross designated critical habitat for the Steller sea lions.
- There may be negative consequences to Steller sea lions because of increased human activity close to important haulouts.
- The SEIS should summarize existing research regarding the presence of the endangered western population of Steller sea lions at the Gran Point and Met Point haulouts.
- Disruption of estuarine and riverine habitat in Berners Bay from road construction and human activity could deplete prey resources for Steller sea lions, harbor seals, humpback whales, and other marine species.
- NMFS recommends that vehicle access barriers be constructed along the perimeter of Berners Bay and that the Slate Creek dock remain inaccessible as a public boat launch; this will help sensitive natural processes and essential foraging activities continue undiminished.

Alternative 2B / Traffic Analysis

- The "no wait" travel time calculation for this alternative is unrealistic; a 45-minute wait time should be attributed to this alternative.
- Incorrect analysis of real time traffic patterns will lead to bottlenecks at the Skagway, Haines, and Katzehin terminals.
- DOT is unfamiliar with tourism traffic patterns in Northern Lynn Canal and has made miscalculations regarding vessel design capacity and scheduling.
- This alternative does not consider the numerous combinations of walk-on passengers, single passenger cars, RVs, freight vans, and high volume passenger vehicles that occur.

Alternative 2B / Transparency

- Is it a conflict of interest that the family of the DOT deputy commissioner owns mineral rights along the road corridor?

Alternative 2B / Transportation Connections & Cost

- The EIS should address what will happen to walk-on ferry passengers regarding transport once they reach the Auke Bay terminal.
- The EIS should analyze the costs of ground transportation between Katzehin and Juneau for walk-on passengers.

- Consider the potential increase of car deck usage if walk-on passengers are forced to bring vehicles.
- Add hourly shuttle service with fast load/unload between Katzehin and Juneau.
- It would benefit Haines to be able to access needed services (medical, etc.) from Juneau.

Alternative 2B / Update

- The SEIS should provide updated effects and cost figures for the changes in the modified Alternative 2B.

Alternative 2B / Visual

- Analyze the cuts and fills in the east Lynn Canal Road to determine whether it would meet the visual quality standards of the USFS and satisfy residents/visitors.

Alternative 2B / Wetlands

- The proposed alignment at about Station 2565+00 will result in fill of marine/estuarine emergent habitat not previously mitigated; can this be reconciled with EO 11990?
- The alternative's proposed wetland mitigation (marine fill) will require compensatory mitigation for the loss of wetland habitat.

Alternative 2B / Wildlife

- Sea lion haul outs are directly in the road's path and must be avoided.
- There are numerous bald eagle nest trees along the proposed route that must be avoided.
- A road would traverse the routes of mountain goats and put them at risk.
- Some road alignment shifts are minor and will minimize impacts to fish and wildlife resources and habitats.
- The realignment could negatively affect habitat use for some species.
- The road elevation rise could create a barrier to wildlife movement.
- A few land animals might be compromised by a highway but it far outweighs the potential impact to marine mammals, sea birds, and fish from ferry travel.

3.3.4 Alternative 3

Alternative 3 / Support (for stated reasons)

- This should have been the main choice because it is less prone to avalanches and has much lower construction costs.
- Alternatives 2B and 3 are the only economically viable alternatives for people living in southeast Alaska.
- Roads are a more viable option even with some initial permitting and construction obstacles.
- We need to reduce our dependence on ferries because they are not cost effective; a road would be much more cost effective in getting us to the Interior or the Lower 48.
- This would solve the access problem, and would create opportunities in the tourist industry, small businesses, outdoor recreation, forest products, and other industries.
- This route would be the easiest to construct and the safest.
- I favor this option because it minimizes the use of AMHS assets; between the costs of labor,

fuel, and maintenance, this mode of transportation needs to be minimized for economic reasons alone.

- Short ferry rides keep the state costs down and user costs to a minimum compared to current service.
- A road-ferry alternative is faster, more convenient, and less expensive for Alaskans and Alaska visitors.
- The west side of Lynn Canal has greater public recreational value.
- This alternative has a more economical capital expenditure and lower O&M costs.
- Alternative 3 has more support in the affected communities and is the only possible safe land route north out of Juneau.
- If you can get them from Juneau to Haines and back on one tank of gas, I am interested, but if it's nothing but more ferries I am not because I can't afford more ferry rides.
- A road from Juneau to Haines would be good for both communities.
- Alternative 3 is the better choice because we wouldn't have to rely on the ferry; we could come and go as we please, and wouldn't have to find a place to stay in Juneau.
- I favor the west side because it doesn't have avalanche problems.
- The west side opens up land for settlement, recreation, and resource development.
- This alternative allows vehicle traffic to reach Glacier Bay through the Endicott.

Alternative 3 / Against (for stated reasons)

- Crossing Lynn Canal at William Henry Bay would be impossible at some times unless a giant ship was considered.
- It's an easier place to build a road, but it doesn't go to Juneau.
- I oppose any alternative that includes construction of a road on Lynn Canal or building additional ferry terminals in any area other than Auke Bay, Haines, or Skagway.
- Alternative 3 would take too long, cost too much, and has too many obstacles.
- This alternative will cause too much environmental damage in construction and in the increased careless land use caused by road access.
- This alternative is illogical and unacceptable because it forces unsafe, undependable, and expensive road extensions to Juneau.
- I am concerned about the effects of road access on fish and wildlife, as well as salmon and herring spawning habitat.

Alternative 3 / Ferry Terminal Location

- Glacier Highway should be extended past Sawmill Cove and on to the Kensington Mine area at the entrance to Slate Creek Cove.
- Shuttle ferry service crossing Lynn Canal to William Henry Bay can be achieved from either a private-public marine terminal with Kensington Mine or a stand-alone terminal within Slate Creek Cove.

Alternative 3 / Marine & Freshwater Habitat Including EFH

- Including a highway along the western shore of Lynn Canal from William Henry Bay to Haines with ferry terminals at Sawmill Cove and William Henry Bay and a bridge over the

Chilkat Inlet is less environmental damaging to EFH.

Alternative 3 / Mining

- The road to the Kensington Mine has great utility as a road to resources as well as a continuation of the Glacier Highway.

Alternative 3 / Permitting

- The proposed improvements with regard to discharge have the potential to directly and indirectly affect the habitat of Berners Bay.
- USACE must determine whether this alternative meets the project's purpose and need because the proposed discharge is likely to have less adverse impact on the aquatic ecosystem.

Alternative 3 / Privatization

- Shuttle ferry service crossing Lynn Canal to William Henry Bay can be achieved from either a private-public marine terminal with Kensington Mine or a stand-alone terminal within Slate Creek Cove.

Alternative 3 / Screening

- After 404(b)(1) screening it was determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose.

Alternative 3 / Service

- A ferry from Haines would connect to Skagway on a seasonal schedule.

Alternative 3 / Tongass Land and Resource Management Plan (TLRMP)

- Several of the areas where DOT&PF moved the alignment to avoid significant karst features are outside the survey corridor, so the karst vulnerability was never assessed.
- The proposed corridor crosses high vulnerability karstlands and is upslope of significant karst features, many which receive upslope surface waters.
- Direct effects would include the alteration of hydrologic patterns, disturbance and removal of protective surficial material and vegetation, and destruction of surficial karst features.
- Future analysis should incorporate guidance from the 2008 Forest Plan for road construction across moderate and high vulnerability karstlands and on areas adjacent to the lands that contribute water to them.
- Road construction can occur across high vulnerability karst, but the effects need to be minimized and mitigation proposed.

Alternative 3 / Transportation Connections & Cost

- Analyze transportation costs to accommodate walk-on passengers with both publicly provided and /or contracted services.
- If the state won't provide money to accommodate walk-on passengers, factor in the costs for them, including potential outcomes of decreased mobility and regional connectivity.
- Consider potential increases to car deck usage if walk-ons are forced to bring vehicles.

Alternative 3 / Update

- We have a natural transportation corridor from William Henry Bay past Pyramid Harbor to the shortest crossing of the Chilkat River at Zimovia Point to the Haines Highway; this

intersection would require a shorter bridge and not direct traffic through a residential part of Haines.

Alternative 3 / USACE

- After 404(b)(1) screening the USACE determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose. Southeast Alaska Conservation Council (SEACC) recommends that this alternative be dropped from consideration for this reason.

Alternative 3 / Wetlands

- The wetlands affected by this alternative would be less than those affected by the proposed project, and they would be of less ecological value than the Berners Bay wetlands.

3.3.5 Alternative 4A

Alternative 4A / Support (for stated reasons)

- Alternative 4A would be my choice mainly because it provides jobs for people.
- I support this alternative because an efficient ferry system would maintain the distinction of Upper Lynn Canal and better our relationships with travelers from near and far.
- This option would bring no complaints from lack of access.
- Visitors would appreciate an alternative to hacking up the mountainside and the expense of maintaining a road.
- I might support this alternative with a better FVF design that provides more reliability than the Fairweather.
- I would like to know the cost/benefit information for 1B, 4A, and 4C to make a final decision; if all else is equal, 4A is my choice.
- Alternative 4A or 4C for an ACF holds more vehicles and can operate in adverse weather.
- It may be sensible to incorporate elements of marine alternatives 4A and/or 4C into 1B.

Alternative 4A / Against (for stated reasons)

- I oppose constructing new FVFs because the Fairweather has not been reliable in Lynn Canal.
- I question the lack of point-to-point routing because it would no longer serve all three Lynn Canal communities and necessitate building three new vessels.
- The routing adds unnecessary capital and operational costs.
- Having dedicated vessels that serve only two of the three communities at once seems redundant.
- The current summer situation with Skagway as a home port is a fine solution; perhaps Juneau could be added as a home port if multiple vessels were required.
- This is so inconvenient to the AMHS rider that it is not even an option.
- I reject any alternative that relies on FVFs because they are proven non-starters.
- Routes that begin only in Juneau are inconvenient and do not serve the needs of Upper Lynn Canal residents.
- This is not justified due to the high cost of building and operating FVFs and the need for

large passenger and vehicle platforms better provided by monohull service.

- This forces unsafe, undependable, and expensive road extensions to Juneau.
- This alternative does not allow unrestricted, economical access to the capital.
- This alternative requires at least three vessels, three crews, and substantially greater fuel expense, which inflates the cost of all options.
- I am in favor of either FVF from Auke Bay (alternative 4A) or the conventional monohull from Auke Bay (alternative 4C), but you may want to consider a hybrid that would have one monohull and one fast ferry from Auke Bay.

Alternative 4A / Evaluation

- The potential of FVFs colliding with and causing disturbance to marine birds has not been addressed.
- Analyze the efficiencies of existing vessels that could be deployed along the Lynn Canal route to find the optimum vessels for this alternative in the context of actual demand as opposed to unreliable traffic demand forecasts.

Alternative 4A / Routing

- At least one Alternative 4 option should retain traditional routing, connecting Juneau, Haines, and Skagway.

Alternative 4A / Screening

- After 404(b)(1) screening it was determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose.

Alternative 4A / Service

- I question the lack of point-to-point routing imposed by this alternative because additional needed routing adds unnecessary capital and operational costs.

Alternative 4A / USACE

- After 404(b)(1) screening the USACE determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose. SEACC recommends that this alternative be dropped from consideration for this reason.

3.3.6 Alternative 4B

Alternative 4B / Against (for stated reasons)

- I oppose any alternative that would build a new ferry terminal in Berners Bay at Cascade Point because there would be no public transportation.
- I oppose constructing new FVFs because the Fairweather has not been reliable in Lynn Canal.
- I question the lack of point-to-point routing because it would no longer serve all three Lynn Canal communities and necessitate building three new vessels.
- The routing adds unnecessary capital and operational costs.
- We are not likely to support construction of a new ferry terminal at Sawmill Creek given its sensitive location; more study and mitigation would be necessary regarding the effects to birds, fisheries, and wildlife.

- I question the lack of point-to-point routing imposed by this alternative because additional needed routing adds unnecessary capital and operational costs.
- I oppose any alternative that includes construction of a road on Lynn Canal or building additional ferry terminals in any area other than Auke Bay, Haines, or Skagway.
- Having dedicated vessels that serve only two of the three communities at once seems redundant.
- The current summer situation with Skagway as a home port is a fine solution; perhaps Juneau could be added as a home port if multiple vessels were required.
- This is so inconvenient to the AMHS rider that it is not even an option.
- Routes that begin only in Juneau are inconvenient and do not serve the needs of Upper Lynn Canal residents.
- I oppose this alternative because it builds a new ferry terminal at Cascade Point.
- This is not justified due to the high cost of building and operating FVFs and the need for large passenger and vehicle platforms better provided by monohull service.
- The cost of new facilities, roads, and road maintenance is too high.
- It is difficult for all travelers in winter and travelers without vehicles in summer to get to the mainline ferry terminal at Auke Bay or to downtown Juneau.
- This forces unsafe, undependable, and expensive road extensions to Juneau.
- I reject any alternative that relies on FVFs because they are proven non-starters.
- I am concerned about the effects of road access on fish and wildlife, as well as salmon and herring spawning habitat.
- This alternative does not allow unrestricted, economical access to the capital.
- This “improves” access at the expense of other Alaska communities by taking ferry services from them and placing added service in Lynn Canal.
- This alternative requires at least three vessels, three crews, and substantially greater fuel expense, which inflates the cost of all options.

Alternative 4B / Evaluation

- Analyze the efficiencies of existing vessels that could be deployed along the Lynn Canal route to find the optimum vessels for this alternative in the context of actual demand as opposed to unreliable traffic demand forecasts.

Alternative 4B / Routing

- At least one Alternative 4 option should retain traditional routing, connecting Juneau, Haines, and Skagway.

Alternative 4B / Screening

- After 404(b)(1) screening it was determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose.

Alternative 4B / Service

- I question the lack of point-to-point routing because it would no longer serve all three Lynn Canal communities and necessitate building three new vessels.

Alternative 4B / Transportation Connections and Cost

- Analyze transportation costs to accommodate walk-on passengers with both publicly provided and /or contracted services.
- If the state won't provide money to accommodate walk-on passengers, factor in the costs for them, including potential outcomes of decreased mobility and regional connectivity.
- Consider potential increases to car deck usage if walk-ons are forced to bring vehicles.

Alternative 4B / USACE

- After 404(b)(1) screening the USACE determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose. SEACC recommends that this alternative be dropped from consideration for this reason.

3.3.7 Alternative 4C

Alternative 4C / Support (for stated reasons)

- Alternative 4A or 4C, for an ACF holds more vehicles and can operate in adverse weather.
- It may be sensible to incorporate elements of marine alternatives 4A and/or 4C into 1B.
- I highly favor this alternative after reading the insert in the Juneau Empire because it accommodates the tourist trade as well as meeting the needs of the community year-round.
- I favor Alternative 1B with the intention of adopting 4C within 10 years, because it is inevitability.
- I would support 4C if 4A proves to be more costly than presently tenable.
- I support Alternative 4C because it provides proven, safe, reliable transportation service between maritime communities and road links and would end the waste of state and federal dollars on an economical and environmental quagmire.
- I need cost/benefit information for 1B, 4A, and 4C before I make a final decision.
- I strongly favor option 4C or option 1 with the only disadvantage of option 4C being the apparent lack of service between Skagway and Haines in the winter.

Alternative 4C / Against (for stated reasons)

- I oppose any alternative that would build a new ferry terminal in Berners Bay at Cascade Point because there would be no public transportation.
- I question the lack of point-to-point routing because it would no longer serve all three Lynn Canal communities and necessitate building three new vessels.
- The routing adds unnecessary capital and operational costs.
- Having dedicated vessels that serve only two of the three communities at once seems redundant.
- The current summer situation with Skagway as a home port is a fine solution; perhaps Juneau could be added as a home port if multiple vessels were required.
- This is so inconvenient to the AMHS rider that it is not even an option.
- Routes that begin only in Juneau are inconvenient and do not serve the needs of Upper Lynn Canal residents.
- This alternative does not allow unrestricted, economical access to the capital.

- This alternative requires at least three vessels, three crews, and substantially greater fuel expense, which inflates the cost of all options.

Alternative 4C / Evaluation

- Analyze the efficiencies of existing vessels that could be deployed along the Lynn Canal route to find the optimum vessels for this alternative in the context of actual demand as opposed to unreliable traffic demand forecasts.

Alternative 4C / Routing

- At least one Alternative 4 option should retain traditional routing, connecting Juneau, Haines, and Skagway.

Alternative 4C / Screening

- After 404(b)(1) screening it was determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose.

Alternative 4C / Service

- I question the lack of point-to-point routing imposed by this alternative because additional needed routing adds unnecessary capital and operational costs.
- The only disadvantage of option 4C is the apparent lack of service between Skagway and Haines in the winter months.

Alternative 4C / USACE

- After 404(b)(1) screening the USACE determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose. SEACC recommends that this alternative be dropped from consideration for this reason.

Alternative 4C / Wildlife

- We might support Alternative 1B or 4C with more study given to fuel efficiency and impacts to wildlife.

3.3.8 Alternative 4D

Alternative 4D / Support (for stated reasons)

- Alternative 4D (with some minor modifications) makes the most sense at this time; FVFs are unreliable and expensive.
- If ferry day service ends up being the preferred way to improve access, a shuttle bus should be included so that anybody with a ferry ticket can ride the bus in order to accommodate walk-on passengers.
- Winter service should include one daily run from Sawmill Cove to Haines with a stop in Skagway. Combining both towns daily and not extending the run to Auke Bay in winter would bring higher ridership, which would pay off in reduced operation costs and 7-day access to both towns.

Alternative 4D / Against (for stated reasons)

- I question the lack of point-to-point routing because it would no longer serve all three Lynn Canal communities and necessitate building three new vessels.
- The routing adds unnecessary capital and operational costs.

- We are not likely to support construction of a new ferry terminal at Sawmill Creek given its sensitive location; more study and mitigation would be necessary regarding the effects to birds, fisheries, and wildlife.
- I oppose any alternative that includes construction of a road on Lynn Canal or building additional ferry terminals in any area other than Auke Bay, Haines, or Skagway.
- Having dedicated vessels that serve only two of the three communities at once seems redundant.
- The current summer situation with Skagway as a home port is a fine solution; perhaps Juneau could be added as a home port if multiple vessels were required.
- This is so inconvenient to the AMHS rider that it is not even an option.
- Routes that begin only in Juneau are inconvenient and do not serve the needs of Upper Lynn Canal residents.
- I oppose this alternative because it builds a new ferry terminal at Cascade Point.
- The cost of new facilities, roads, and road maintenance is too high.
- It is difficult for all travelers in winter and travelers without vehicles in summer to get to the mainline ferry terminal at Auke Bay or to downtown Juneau.
- This forces unsafe, undependable, and expensive road extensions to Juneau.
- I am concerned about the effects of road access on fish and wildlife, as well as salmon and herring spawning habitat.
- This alternative does not allow unrestricted, economical access to the capital.
- This alternative requires at least three vessels, three crews, and substantially greater fuel expense, which inflates the cost of all options.

Alternative 4D / Evaluation

- Analyze the efficiencies of existing vessels that could be deployed along the Lynn Canal route to find the optimum vessels for this alternative in the context of actual demand as opposed to unreliable traffic demand forecasts.

Alternative 4D / Routing

- At least one Alternative 4 option should retain traditional routing, connecting Juneau, Haines, and Skagway.

Alternative 4D / Screening

- After 404(b)(1) screening it was determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose.

Alternative 4D / Service

- I question the lack of point-to-point routing imposed by this alternative because additional needed routing adds unnecessary capital and operational costs.

Alternative 4D / Transportation Connections and Cost

- Analyze transportation costs to accommodate walk-on passengers with both publicly provided and /or contracted services.
- If the state won't provide money to accommodate walk-on passengers, factor in the costs for them, including potential outcomes of decreased mobility and regional connectivity.

- Consider potential increases to car deck usage if walk-ons are forced to bring vehicles.

Alternative 4D / USACE

- After 404(b)(1) screening the USACE determined that this alternative was not practicable when considering cost, existing technology, and logistics in light of the project purpose. Southeast Alaska Conservation Council (SEACC) recommends that this alternative be dropped from consideration for this reason.

3.3.9 Alternatives

Alternatives / Evaluation

- Don't waste our time and money updating the action alternatives considered in the 2006 FEIS; take advantage of previous analysis by USACE, EPA, USFWS, and NMFS.
- FHWA and DOT&PF must take a hard look at the effects of a marine alternative that provides improved regular and safe transportation to Lynn Canal to foster informed decision-making and public participation, or will fail to fulfill the purpose of NEPA.
- Renumber the new alternative as Alternative 2 and the road alternative as Alternative 3.
- Make sure the SEIS includes a comprehensive, integrated analysis of regular, predictable, safe transportation to Lynn Canal.
- If the Lynn Canal marine alternative would diminish service to other southeast Alaska communities, consider a third action alternative that would build two or more ACFs to meet capacity demand and provide adequate system-wide service.
- If FHWA and DOT&PF are updating 2006 alternatives, they should initiate early consultation on a range of alternatives and cumulative actions with the NMFS.
- Dropping alternatives with ferry service from Berners Bay would avoid disruption of the prey base for Steller sea lions and humpback whales, as well as collisions that might harm them.
- To mitigate impacts to Berners Bay, show that there are no other feasible land or water routes, that building a road through the bay is environmentally preferable, and that site-specific mitigation measures will be sufficient.
- Comparative analysis of transportation alternatives should provide sufficient analysis to determine if there are other feasible land or water routes available, to avoid impacts to old-growth habitat.
- Statistics in the last EIS were misleading, particularly in regard to cost per mile of vehicle transport by road and ferry.
- The cost estimates in the last EIS were underestimated.
- Each identified geologic obstacle should be engineered and estimated individually by an independent contractor in the geotechnical report to determine a true cost estimate.
- Problems with the 2006 FEIS included a bias toward building an East Lynn Canal road; all reasonable alternatives should be rigorously explored and objectively evaluated in this SEIS.
- The 2006 FEIS had many flaws; Lynn Canal Conservation, Inc. suggests the methodology used to compare road options to ferry options be entirely revisited in this SEIS.
- The fiscal constraint outlined in the state's LRTP should be a primary consideration when

considering whether an alternative is viable or should be eliminated.

- Building a new terminal at Berners Bay would not be public transportation, but rather public money used to provide transport for a private mining company.
- A successful model would include road segments and smaller shuttle boats, where boats are home ported in the smaller communities with local resident workers.
- Compare data on injuries and fatal transportation accidents on existing highways in Skagway/Haines/ Juneau versus injuries and fatal accidents on the marine highway.
- Use data on existing highways with similar topography and weather to estimate avalanche- and weather-related closures for new roads.
- Compare data on cancellations of ferries in Upper Lynn Canal versus closures of state-maintained roads in Haines and Skagway.
- Determine which alternatives include large long-lasting visual changes that minimize the landscape.
- Determine how our cultural framework will be altered by changing from a water-based to a road-based environment and which alternatives will maximize or minimize this.
- Determine the projected job losses and gains in the communities for different alternatives.
- Determine which alternatives impact sensitive natural areas and which do not.
- Include information on community support for different methods that was obtained through surveys and referenda.
- Determine which alternatives enhance the efficiency of the AMHS in southeast Alaska and which make it more inefficient or expensive.
- Consider whether alternatives include large engineered landscape modifications and the relative cost of restoration of those modifications in the future.
- Include evaluation of reasonable alternatives such as improved ferry service supported by an enterprise investment fund.
- Alternatives that include a new terminal should add an AMHS-operated shuttle service to Auke Bay so foot passengers can access transportation services there; integrate this into the AMHS so passengers can book a shuttle seat when they pay for ferry passage. All costs should be included in the alternatives.
- All cost estimates should be reviewed and verified by an independent third party.
- Evaluate how Lynn Canal road construction would impact bird habitat.
- Roads can cut off access to water's edge food resources for brown bears.
- We are not likely to support construction of a new ferry terminal at Sawmill Creek given its sensitive location; more in-depth study and mitigation is necessary regarding the effects to birds, fisheries, and wildlife.
- Road-only transportation cannot be considered at this time, but it is the only alternative that will improve access to our capital.
- The court's decision mandates more comprehensive analysis as well as more accurate and precise application of established principles of economic analysis, transportation planning, and engineering assessment.

- Any comparisons with regard to costs and revenues on the various marine segments should use uniform criteria and performance formulas.
- A more balanced analysis would allow for discussion regarding the role of tariffs/revenues and how they impact the project's purpose and need.
- DOT&PF should pay special attention to the tariff issue and do extensive research into the AMHS ticket price structure to achieve an optimum ticket price to maximize efficiencies of demand and revenue capture.
- The tariff analysis in the FEIS misrepresents the true cost per mile; the discrepancies should be addressed in any future DOT planning documents.
- The only way to achieve a true comparison between a road link in Lynn Canal and ferry transportation in Lynn Canal is to develop a model for marine transportation as a stand-alone operation over the identical distance of the proposed road.
- Justify underlying traffic assumptions regarding large projected demand for vehicle traffic.
- A new complete and independent study of the costs of building the roads needs to be done.
- Do an updated analysis on the effects of all alternatives on aquatic resources in consultation with all appropriate resource agencies.
- All memos and notes of all consultations should be made public in a way that is easily accessible.
- All possible safety hazards along the road routes need to be identified and analyzed regarding maintenance costs.
- Re-evaluate the SEIS in regard to the Tongass Management Plan and the National Roadless Rule.
- Unviable alternatives should be removed and a comprehensive vessel operation matrix alternative should be made, analyzed, and put into the SEIS.
- Alternatives requiring construction of a road around Berners Bay and up the west side of Lynn Canal must detail the impacts of expanded OHV use into sensitive fish and wildlife areas.
- Each alternative should project its carbon footprint.
- Disclose whether or not DOT is creating High Risk Rural Roads per SAFETEA-LU / 23 USC 148 with the alternatives featuring road construction.
- Remove alternatives that require a new ferry terminal at Cascade Point, because building and staffing a second Juneau ferry terminal is inefficient and unnecessary.
- FHWA needs to compare the 2006 Land-Use Designations (LUDs) to the LUDs approved in the 2008 Forest Plan and determine if there have been changes to underlying LUDs in the Transportation and Utility System overlay. *[This comment was categorized under "Alternatives/Evaluation/TLRMP," because the full comment focused more on evaluation than on the management plan.]*
- USFS needs confirmation that the 2006 FEIS went through State Historic Preservation Office consultation and compliance with Section 106. *[This comment was categorized under "Alternatives/Evaluation/Cultural Resources," because the full comment focused more on evaluation than on cultural resources.]*

- Under the current day ferry schedule these appointments mandate our spending at least 2 nights in Juneau.
- The figures used by DOT&PF related to future or anticipated transportation needs in the Lynn Canal Corridor are sketchy.

Alternatives / Alternative 2

- The detailed route of the Lynn Canal Eastside road extension beyond Katzehin should be noted in the SEIS.
- A cost estimate of the road extension beyond Katzehin and its funding sources should be in the SEIS.
- The extension beyond Katzehin should be analyzed as foreseeable future cumulative impacts under NEPA.

Alternatives / Terminal Location

- I am opposed to building a road to a new ferry terminal located more remotely from our communities because it would make travel for walk-on passengers more expensive and inconvenient.
- Ferry terminals should be located near something interesting to keep travelers occupied.

Alternatives / TLRMP

- The USFS states that FHWA must determine if there have been any changes to the applicable forest-wide standards and guidelines.
- The USFS states that FHWA must prepare a BE/BA for Threatened and Endangered Species and consult with the USFWS/NMFS especially regarding marine mammal haulouts.
- The USFS states that increasing ATV use in the area should be addressed.
- The USFS states that geotechnical evaluations should be conducted to characterize the stability of surficial sedimentary material such as soils along any newly constructed corridors or facilities.
- The USFS states that climate change should be covered at a level so the reader has a sense of what potential contribution the project alternatives will have towards climate change.

Alternatives / Transportation Connections and Cost

- There is no point in corralling passengers at Echo Cove or Berners Bay; foot passengers will be stuck in the middle of nowhere, and transportation costs to and from town will increase.

Alternatives / Update

- Whatever has happened that could affect the various alternatives since the ROD in 2006 or approval by USACE of the 404 permit in 2008 should be acknowledged in the SEIS and as applicable indicate a preferred alternative.
- The SEIS must distinguish the differences in the currently proposed road alignment from the road alignment evaluated in the FEIS and clearly depict other project changes.

3.3.10 Construction Impacts

- Although expensive, piling can be used instead of fill to cross the area of concern without affecting the species; this should be included in the proposal.

Construction Impacts / Invasive Plants

- USFWS recommends that DOT&PF implement control measures and prevent the spread of invasive plant species through project management and contracting.

Construction Impacts / Native Plants

- For post-construction planting USFWS recommends using a seed mix that emphasizes native flowering plants beneficial to native pollinators.

Construction Impacts / O&M

- Time mowing and herbicide use seasonally to minimize impacts to plant species that pollinators rely on for nectar or in the larval stages.

3.3.11 Cost Analysis

- Please include the cost to ferry passengers/cars compared to driving in cost analysis and not just the direct governmental costs.

3.3.12 Cultural Resources

- I urge you to consult with local tribes, Alaska Native corporations, Douglas Indian Association, Central Council of Tlingit and Haida Indian Tribes of Alaska, Sealaska Corporation, and Goldbelt Inc. in regard to cultural and traditional sites.

3.3.13 General Marine Ferry Alts

General Marine Ferry Alts / Support (for stated reasons)

- Marine transportation is generally economical because we don't have to maintain the ocean like we do roads.
- Our ability to rely on water in Southeast Alaska for electricity and transportation is a huge asset.
- The cost benefit of improving and strengthening our existing ferry system is much higher than extending the road and cutting up the world-class fjords in our back yards.
- I suggest investigating private sector ferry service for Lynn Canal to reduce capital costs for Lynn Canal ferries and reduce long-term state O&M and employee expenses.
- Monohull vessels are more durable, seaworthy, and cost-effective than FVFs.
- Southeast Alaska Conservation Council strongly supports Alaska Ship and Drydock and the state in their efforts to invest Alaskan money in Alaskan infrastructure and laborers.
- The AMHS is a practical and versatile mass transit system.
- I would like to see greater effort devoted to upgrading the AMHS; we need to build ferries that can run between major communities as well as smaller ones.
- The ferry system is more sustainable, cheaper, and environmentally viable.
- The enjoyable time shared by all aboard the AMHS displacement vessels is a huge plus.
- Improved service on the marine highway makes greater fiscal sense.
- Two ferries are still cheaper and safer than a road.
- The thought of having to drive my car down to Juneau in the winter for a needed departure or medical emergency is daunting and I would not recommend it to anyone I love.

- The money for creating a road would be better spent continuing to upgrade the ferry fleet.
- Ferries don't have to close because of dangerous avalanche conditions.
- The AMHS is a workable route for residents and a unique, wonderful attraction for visitors.
- We have the geographic distinction of being separated from our capital city; this is an asset that increases Juneau's tourist appeal.
- The ferry system is much safer for transporting groups of school kids, and sleep-deprived adults don't have to worry about driving long roads.
- A combination of ferry and air service should be our priority.

General Marine Ferry Alts / Against (for stated reasons)

- FVFs are vulnerable in heavy water.
- Ferries are inconvenient, unreliable, and expensive.
- Ship schedules are too restrictive compared to driving yourself.
- It would help if the state would subsidize ferry service.
- Moving the ferry terminal farther away makes it more inconvenient and expensive for me to transport my high school team to events.
- It's difficult for injured or sick people to get places fast or easily with the ferry.
- The Fairweather is less than reliable in our waters.
- Wherever possible, roads should be lengthened and ferry runs shortened.
- Most of the operation of the present AMHS is based on a 50 year old model and continues to be a subsidy drain on state resources.
- These alternatives do not allow unrestricted economical access to Alaska's capital city.
- There's the question of capital costs for replacement of the aging fleet.
- The cost inhibits tourism.
- Eliminating the AMHS between Juneau and Northern Lynn Canal communities means more resources that can be focused on those communities where a road is simply impossible because they are on islands.
- Lack of access to better weather is harmful to recruiting and retention of skilled workers.
- The present ferry system makes it hard for locals to get reservations unless plans are made well in advance, so it to be a system for tourists.
- Ferries are not environmentally friendly when you consider fossil fuel consumption and potential wake damage.

General Marine Ferry Alts / AMHS System Analysis

- There is a need to provide more substantial study to the Marine Transportation alternative; a more expansive, creative approach will yield a more cost-beneficial product.
- Lynn Canal makes a disproportionately large financial contribution to the overall AMHS system as compared to the rest of the region, so the loss of its revenues would have a negative impact on the rest of the system.
- Consider the Lynn Canal Transportation Project report and business plan regarding configuration of a stand-alone ferry system operating solely in Lynn Canal.

- Hire an outside economic firm to perform a price elasticity study for the AMHS with regard to tariffs and demand.
- Incorporate and investigate tariff modification recommendations outlined in the AMHS Tariff study by Northern Economics, Inc. (2008).
- Include the AMHS staff in the development of vessel deployment and scheduling matrices.
- All marine deployments must take into account impacts on other communities in Southeast Alaska.
- Consider seasonally basing an existing traditional vessel like the Malaspina in one of the northern Lynn Canal communities and operating another traditional vessel seasonally from Auke Bay.
- Review all possible combinations of vessels in service between Skagway, Haines, and Juneau, taking into account impacts on other communities.
- Add a boat or two to the ferry system and call it good.

General Marine Ferry Alts / Convenience

- If we dumped \$400 million into the ferry system we'd have a flexible, versatile, and efficient transportation system.

General Marine Ferry Alts / Cost

- Building the road may encourage people to drive a lot more, leaving the ferries empty, which would render some expensive assets obsolete.
- Ferries that come to the upper Lynn Canal must stop at both Haines and Skagway; traveling all that way just to skip one port is wasteful.
- Costs to the state can be significantly reduced with the right mix of ferries based on passenger demand and weather at that time of year.
- The ferry is just too expensive for me.
- From a long-term standpoint the cost of ferry replacement, maintenance, salaries, and pensions will far outweigh the expense of a road.

General Marine Ferry Alts / Cost Analysis

- Assess the importance of Lynn Canal traffic to the AMHS by providing statistics on passenger volume, vehicle volume, passenger revenue, vehicle revenue, and total Lynn Canal revenues for the most recent five-year period.
- Cost analysis of these alternatives should be done by an independent outside source because DOT consistently casts the best light on their pre-determined best alternative.

General Marine Ferry Alts / Efficiency

- A new ferry should be home ported in Skagway because it is much more important to the lives of the people of Haines and Skagway to depart in the morning than it is for people in Juneau.
- For efficiency the number of ferries weekly in Lynn Canal should vary with the demand.
- I think the existing ferry service could be more efficient at loading and with ticket taking; I suggest the management team travel to Vancouver and tour the Tswassan ferry terminal.

General Marine Ferry Alts / Environmental

- The EIS neglects to address the environmental consequences of creating a new remote port in the navigable waters of Alaska.

General Marine Ferry Alts / Evaluation

- A comprehensive discussion of the use of existing AMHS assets requires a study of vessel deployment, scheduling, and routing segments and a deeper analysis of tariffs and revenues.
- Why is there a discrepancy between existing tariffs and ticket prices proposed in the EIS? If there are significant cost savings why haven't you instituted these cost savings for the public under the existing structure?
- The traditional ferry routes and the summer day boat have proven reliable and efficient.
- Your newsletter should have listed much more information in the "Comparing Ferries" table, such as passenger occupancy, number of restrooms, handicap accessibility, wi-fi access, and more.
- Your newsletter should have listed the estimated cost of each alternative.

General Marine Ferry Alts / Facilities

- I travelled on the ferry in British Columbia and was astounded at their efficient ticket booths with weighing stations, comfortable waiting mall with cafes, shops, bars, and couches.

General Marine Ferry Alts / Ferry Design

- Consider the weather conditions in Lynn Canal in the design of the shuttle ferry.
- A new ferry should be built specifically for Lynn Canal that would maximize the number of cars and people, with few or no staterooms, fuel efficient, at least the size of the Taku, with a hull designed for rough conditions.
- An ACF ferry should be adapted to load and unload from both sides to speed up turnaround.
- Monohull ferries are safer in winter; FVFs are not suited for winter conditions in Lynn Canal.
- In the summer, larger monohull ferries can be deployed during peak demand or to increase daily/weekly sailings, or you could use shuttles to accommodate peak demand.
- The extra speed of FVFs is not worth the fuel they consume.
- The new ferry should be designed to carry containerized goods as well as private vehicles.
- We need a ferry structure that ensures the number of trips that adapts to rider trends.
- We have concerns about fast ferries' potential collisions with and disturbance to marine birds.
- I do not support the construction of new ferries and would prefer that existing ferries be maintained.
- Conventional monohull shuttles offer the most consistent service in the common types of weather here in Southeast.
- Find the optimum vessel configuration to meet transportation needs in Lynn Canal.
- The FVF Fairweather and even the small monohull Aurora have proven their inability to cope with Lynn Canal conditions, especially in winter.
- Hopefully when the older ferries are replaced we will not lose vehicle space.

General Marine Ferry Alts / Ferry Home Port

- Base a ferry for the Skagway-Haines-Juneau run in Skagway so that it is possible to make a roundtrip journey to Juneau in one day.

General Marine Ferry Alts / Fuel Utilization

- We prefer proposals that favor the most fuel efficient alternatives and a structure that insures the number of trips that adapts to rider trends.

General Marine Ferry Alts / Funding Source

- If the legislature could find a way to put money into the Marine Highway Fund as an investment account, the interest accrued could help offset all or part of the ferry's annual deficit.

General Marine Ferry Alts / Homeland Security

- The EIS should address Homeland Security's maritime security requirements and their associated costs.

General Marine Ferry Alts / O&M Cost

- The cost to buy, maintain, and operate ferries is too expensive.
- The state's reason for preferring a road in the last EIS was that that the ferries' O&M costs are too high, so specific Lynn Canal costs should be analyzed further in the new EIS.
- To lower operating costs, new ferries could run on biodiesel.
- There should be an analysis of potential innovations both in function and funding—such as wind power, solar power, biofuels, allowing corporate sponsorship and advertising—to reduce operating costs.
- Combining local ferry traffic with out-of-state cruise ship visitors seems to be a win-win possibility to serve transit needs of locals and fill otherwise empty berths on cruise ships.
- In the long term, the cost of ferry replacement, maintenance, salaries, and pensions will far outweigh the expense of a road.

General Marine Ferry Alts / Reliability

- The Haines economy depends on reliable people movement through town year-around., and the ferry is the most reliable way to do this.
- Marine transportation must be predictable and available on a regular basis, taking into account seasonal differences in demand.
- The AMHS system is no longer reliable because of aging ferries, misplaced/inadequate fast ferries, and sub-regional loop service constantly impacted by failures in other parts of the system.

General Marine Ferry Alts / Safety

- All marine transportation must be safe.

General Marine Ferry Alts / Schedule

- I don't think the increased schedule is terribly necessary because I would usually fly.
- AMHS service to Sitka must be maintained summer and winter at least at the current rate.
- The summer 2012 restoration of service between Sitka and Angoon also should be maintained in any new configuration.

- It would help Skagway in the winter if, 3 days a week, the ferry would originate in Skagway, have a 6-hour layover, and return the same day.
- Home-porting the new ferry would make one-day trips to Juneau possible.
- For efficiency, the number of ferries weekly in Lynn Canal should vary with demand.
- The ferry's arrival and departure times should be more convenient.
- The schedule should be reversed between Haines and Juneau so the ferry goes from Haines to Juneau in the morning, and back to Haines in the evening; the current schedule is entirely oriented to Juneau residents.
- Discussion of the use of existing AMHS assets requires a study of vessel deployment, scheduling, and routing segments as well as a deeper analysis of tariffs and revenues.
- Address improvements in the level of ferry service in Lynn Canal with special attention to regular and predictable daily ferry service, particularly during times of high demand.
- Keep the schedule simple and route ferries Juneau/Haines/Skagway/Haines/Juneau instead of more boats and added costs with individual routes.

General Marine Ferry Alts / Service

- I hope the alternatives discussed in the DSEIS do not reduce ferry service to other Southeast Alaska ports.
- The ferry system would operate much more efficiently if there were flexibility build into the system and a way to predict traffic.
- The FVF has been successful at serving Sitka in the summer and the City and Borough of Sitka would like to see it expanded to winter.
- Qualitative and quantitative improvements in Lynn Canal ferry service should focus on regular and predictable daily ferry service, particularly during times of high demand.

General Marine Ferry Alts / Socioeconomic

- Ferries serve the economy of the entire Southeast region, and we should deal with this in addition to environmental issues.
- The Haines economy depends on reliable people movement through town year-round.
- I recommend maintaining the Juneau-based terminal in Auke Bay to serve Southeast Alaska and those in villages who rely on Juneau for medical, transportation, and shopping needs.
- Construction of new ACFs in Ketchikan will provide jobs and increase capacity of the ship construction facility there.

General Marine Ferry Alts / Terminal Location

- I oppose moving any ferry terminals farther from population centers.
- Keep the terminal at Auke Bay because it is best for travel connections, shopping, medical facilities, and travel safety.
- The Auke Bay terminal best serves our friends who live in villages and rely on Juneau.
- The terminal should remain at Auke Bay for public safety, convenience, and cost reasons.
- Using Berners Bay for a terminal is very inconvenient.
- Cars arriving off ferries at Auke Bay should not have to drive 30-40 miles to catch the Lynn Canal ferry.

- Foot passengers arriving at Auke Bay would have no way to get to Berners Bay for the Lynn Canal ferry.

General Marine Ferry Alts / Transportation Connections and Cost

- Public transportation from the ferry terminals into the towns they are near would be great.
- Instead of spending money to move the terminal farther away, create a shuttle service so we could have mass transit to and from the Auke Bay terminal.
- DOT needs to analyze what it will cost walk-on passengers to get to their destinations in Juneau, Haines, or Skagway compared to current costs.
- More needs to be done to accommodate transit connections for walk-on passengers.
- Conduct a summer 2012 survey of locals and arriving/departing travelers to determine if added distance to the terminal would have an impact.

General Marine Ferry Alts / Transportation Needs

- We would prefer proposals that favor the most fuel efficient alternatives and a structure that ensures the number of trips that adapts to rider trends.

General Marine Ferry Alts / Travel Demand

- Analyze the seasonal passenger and vehicle occupancy rates for Lynn Canal marine segments to determine if the No Action Alternative has met the travel demand during the most recent five-year period.
- Assess the importance of Lynn Canal traffic to the sustainability of the AMHS using the most recent 5-year figures for passenger/vehicle/overall volume and revenue.

General Marine Ferry Alts / Update

- I would like to know whether you have identified any useful ferry-user feedback, particularly from low-income and other ferry-dependent users, including crews.

3.3.14 General Project

- We ask that the DOT&PF address our Final Comments on the Juneau Access FEIS submitted in March 2006 (Skagway Marine Commission).

General Project / Evaluation

- The EPA review of the revised SEIS will consider expected environmental impacts of the project as well as the adequacy of the EIS in meeting NEPA public disclosure requirements.
- DOT&PF must complete the SEIS in a manner that is fair, unbiased and conforms with federal legal requirements.
- After CBJ review of the current proposed alignment and information provided by DOT, it does not appear that another CBJ consistency review is required; final determination will be made after the environmental process is complete.

General Project / Homeland Security

- The FEIS did not identify the Department of Homeland Security/USCG as a cooperating agency or pursue any discussion or investigation regarding Maritime Security for the marine alternatives.

3.3.15 General Road

General Road / Support

- Juneau has needed a road in and out of town for a long time.
- We need reliable access connections to the Alaska Highway.
- Between USCG labor costs and the rising cost of fuel and maintenance, ferry transportation needs to be minimized for economic reasons alone.
- I would be in favor of adding a toll component to the Juneau Access road to offset maintenance costs.
- Roadway travel would be less expensive than AMHS travel.
- An access road will open recreation areas for boating hiking, skiing, off-roading, and boating along Lynn Canal.
- The road will help our standard of living and the economy.
- I need to be able to use the road spontaneously.
- A road would make my business here in Juneau so much easier; I cannot stress how important a road in and out is to me and my fellow Juneau citizens.
- I fully support the road; cheaper, more reliable access for citizens, tourists, and goods is a win-win for everyone.
- This project will make living in Juneau and all of southeast more affordable and provide recreation opportunities now only afforded to the affluent population.
- I cannot wait for the road from Juneau to be built to Skagway because it is needed for fast, economical medical transport.
- Vehicle travel on roads is more eco-friendly.
- For the most part, most of AMHS' customers are there for lack of a suitable alternative.
- The road between Canada and Alaska's capital city will be successful, and its success will be irrefutable because of expanding tourism, commerce, and trade.
- The constant refrain that a road is impossible to build and would be wiped out by avalanches is exaggeration when compared to more difficult locations that have successful roads.
- A road will significantly reduce greenhouse gases in northern Southeast Alaska and would be much less expensive to maintain than operating ferries.
- Access to Alaska's capital is of extreme importance because transportation is a major part of our local government's comprehensive plan.
- A road would remove the perception of our "remoteness" and make the capital more accessible to all residents.
- The road would also increase travel options to families who cannot afford to fly out of state.

General Road / Against

- I agree there should be more access, but I do not agree with the idea of constructing any roads farther than those that exist.
- Road funds would be better spent on improved ferry service.
- If this was a direct road connection it might have merit, but since it's just an extension it's a

waste of time and money.

- All road alternatives are what they have always been: an indefensible and inordinately expensive pipe dream.
- It is hard to imagine a more unrealistic topographical and geological landscape in which to try and build (much less maintain) an all-weather, all-year road.
- Road-building proponents should focus elsewhere, perhaps revisiting the Taku or Stikine proposals.
- Building a road would mean more cars burning fuel, staffing a ferry terminal miles from a community, and providing adequate facilities for waiting travelers.
- This project will cost the state billions, and that isn't counting the ferries we'll have to buy.
- This road is not only a financial boondoggle, it is preposterous and unsafe.
- The road would be seasonal only and would be more expensive because of layovers and weather interruptions.
- Shuttle ferry schedules and costs are not explored; I fear this would be expensive and inconvenient for many.
- Extending the Glacier Highway benefits only private individuals and mining companies.
- We should not be spending money on Juneau Access improvements when we are cutting education and services that Alaskans need.
- All road alternatives underestimate construction costs and fail to acknowledge that no road pays for itself.
- Include in your estimates a toll for using the road and the costs of keeping it open in winter.
- The notion that this access will be better is driven by monied interests and lack of vision rather than public demand or reality.
- It's old school to believe that the more roads we have and the more nature is developed, the better off we are.
- I believe this would be a hardship on Haines and Skagway, as well as thousands of walk-on travelers.
- The costs associated with building and maintaining this road are too high.
- Coaches cannot afford any additional expenses in getting our kids to competitions.
- I cannot see how Juneau will cope with an endless stream of campers that will be able to drive there in the summer.
- There are too many challenges, including avalanche zones, sensitive habitat, winter maintenance costs, and shrinking federal dollars for funding.
- I don't believe that using a road would take less time than a ferry, especially in winter.
- An east-side road would disturb the Steller sea lions at their Seal Rock and Pyramid Harbor haul outs, as well as arctic terns on Pyramid Island.
- Building such infrastructure is too expensive and will impact wildlife and the viewshed, present many public safety hazards, and limit travel because of unstable conditions.
- The proposed road is a very dangerous and incredibly destructive proposition.
- Berners Bay will have unacceptable environmental impacts.

- DOT&PF is biased toward road construction and has low-balled road construction and long-term maintenance costs.
- DOT estimates that 8 people would die on a Juneau road over a 40-year period, and there would be 600 non-fatal vehicle accidents; no one has ever died on a marine highway.
- Building a road will weaken the health of the overall ferry system.
- The Lynn Canal is home to sea lions, mountain goats, and salmon runs that would all be negatively impacted if a road were built.
- The proposed road would pass through important areas for sea lions, eagle nesting grounds, and important fish habitat.
- Compromising wildlife habitat will have an adverse economic effect on tourism and fishing.
- I think some people want this road to promote business for some stores, land companies, and a few big construction outfits.
- This will subject us to unsafe drivers—inebriates, cell phone users, joy riders, inexperienced winter drivers, etc.
- We will be subjected to long waits and indeterminate delays from “first come-first served” shuttle service.
- As we’ve gotten older, our reflexes have slowed and it’s difficult to drive after dark; we don’t like being required to drive.
- We will be stranded at the proposed terminals without public transportation.
- There’s significant driving distance in wilderness landscape with no service for tire blow-outs, animals in the headlights, or other difficulties.
- It is carelessness to replace a ferry service with an unsafe and environmentally disastrous road and ferry combination.

General Road / Alternatives Considered but Eliminated

- The Klondike National “Historic” Park objection is not valid; Skagway has always been a transportation corridor.
- The pass through the mountain is an asset of the State of Alaska and should be a shared resource like oil money and the Permanent Fund.

General Road / Construction Cost

- It will cost too much to build, too much to keep open during winter, and is useful only if you have a car.
- There is no point in incurring such tremendous costs for construction, maintenance, and emergency services; our money should be spent on more urgent projects.

General Road / Convenience

- If the road involves a ferry to cross a certain section, that seems to make the road significantly more inconvenient.

General Road / Cost

- If the road involves a ferry to cross a certain section, that seems to make the road significantly more expensive.

General Road / Cost Analysis

- There should be an independent cost analysis done for the whole project, not one that is stopped one third of the way through as the Golder Associates report was.
- Depending on unidentified resources to finish a project can easily result in a failed project; this is not compatible with the FHWA directive to identify total costs and schedules and assure that funding strategies are in place.

General Road / Environmental

- Building a road up either side of Lynn Canal, which is still reliant on ferries, seems fiscally, logically, environmentally, and safety-wise totally reckless.

General Road / Evaluation

- Include an independent analysis of DOT-supplied road building and O&M cost estimates, taking into consideration the geotechnical features identified in the 2006 Golder Report.
- Compare East and West Lynn Canal road alternatives in an apples-to-apples manner regarding construction, O&M, and marine segment costs.

General Road / Fuel Utilization

- I would like to know how much reduction in fuel gallons per vehicle mile the road would attain, as well as the reduction in carbon footprint per mile.

General Road / Funding

- Full funding for any road alternative needs to be identified and to be certain before any road building goes forward.
- Piece by piece funding of a mega project is simply unacceptable.
- Budgets are being cut for all federal agencies and congress is being very conservative when dealing with the debt crisis; DOT needs to take this into account regarding funding for an east or west side road.

General Road / New Alternative

- Road access via Taku near Altin would be shorter, if it's viable.

General Road / O&M Cost

- Maintaining the road would be costly.
- It'll cost too much to build cost and too much to keep it open through winter.
- We should spend money on urgent projects instead of incurring tremendous construction, maintenance, and emergency services costs for any extension of the current road.
- The money should be spent on improving our ferry system instead of on maintenance of another avalanche-prone road.

General Road / Safety

- The road is long and risky and would be a temptation for people to put their lives in danger.
- With the large amount of slide activity and hazardous terrain, safety would be compromised with a road.
- We should spend money on urgent projects instead of incurring tremendous construction, maintenance, and emergency services costs to extend the current road.

General Road / Traffic Analysis

- Road closings and winter road conditions have to be considered in the mix, and not only the roads being proposed in the SEIS.
- Reliability is directly related to demand and time of travel.
- Need to analyze whether the road alternatives work better than flying to get Alaska citizens to the state capital when the legislature is in session.

General Road / Transportation Connections and Cost

- I would like to know how foot traffic would get from any of the proposed new terminals to the airport or downtown Juneau and where drivers might store their vehicles.
- It is inconvenient to ride a ferry to the next town, get off, and wait for another ferry so I can continue my trip.
- Having to get to and from a ferry terminal located far out of Juneau would make travel harder.
- A ferry terminal at Berner's Bay or north of it will increase our travel time and expenses.
- The road extension alternatives would be cost-prohibitive for walk-on travelers and shuttle companies.
- What will happen to those who are stranded at new alternatives because road closures or ferry service interruptions, particularly in winter?

General Road / Visual

- I see no point in incurring tremendous costs for inevitable and unnecessary disruptions to the landscape.

General Road / Wildlife

- I see no point in incurring tremendous costs for inevitable and unnecessary disruptions to wildlife.

3.3.16 Government-to-Government Consultation

- As the FHWA is responsible for government-to-government and government-to-corporation consultation, given the presence of significant traditional and cultural sites near the Juneau access points, I urge you to consult with Douglas Indian Association, Central Council of Tlingit and Haida Indian Tribes of Alaska, Sealaska Corporation, and Goldbelt, Inc.

3.3.17 Land Use

Land Use / Infrastructure Improvements

- The only major thing I know of is the ongoing infrastructure upgrades by DOT&PF, and possible ore transshipment and inbound freight for building mining facilities. The biggest potential item on the horizon is possible export of Yukon liquid natural gas via Haines.

3.3.18 Marine and Anadromous Fish & Shellfish

- USFWS recommends using or upgrading existing development sites at Echo Cove or Cascade Point rather than development in new areas because of a major eulachon spawning run.

3.3.19 Marine and Freshwater Habitat Including EFH

- ADF&G is conducting studies to assess possible changes in the aquatic environment from mining activities and would like to discuss our study sites with DOT&PF in relation to the proposed road alignment shift.
- FHWA should consult with ADF&G to obtain up to date information regarding fish habitat within the proposed project area.
- Birds and marine mammals use Berners Bay throughout the year; a USFWS report recommended against development of new facilities near sites where significant concentrations of animals were noted.
- USFWS recommends using or upgrading existing development sites at Echo Cove or Cascade Point rather than development in new areas that might negatively impact shoreline-dependent birds and marine mammals.

3.3.20 Permitting

- The revised Draft SEIS should incorporate to the extent possible a draft 404(b)(1) analysis or practicability analysis for any project component under all action alternatives that may require a USACE permit or permit modification under Section 404 of the Clean Water Act (CWA).
- USEPA continues to provide oversight of the State's implementation of the National Pollution Discharge Elimination System under Section 402 of the CWA, which includes discharge of stormwater.
- USEPA expects to review and provide input to the USACE on the 404 Public Notice.
- Include a preliminary 404(b)(1) evaluation.
- USACE recommends you perform a delineation of all jurisdictional boundaries of the Waters of the US within the project area for USACE to approve a current jurisdictional determination.
- A functional assessment should be a component of the compensatory mitigation plan.
- The functional assessment should be used to formulate an explanation of how the proposed compensatory mitigation is environmentally preferable and how it would offset the individual and cumulative impacts to aquatic resources resulting from the proposed project.
- The functional assessment should contain information about the mitigation and impact sites.

3.3.21 Project Description

- Since all alternatives have a marine component, any references to Juneau as “the largest community on the North American continent not connected to the continental highway system” is meaningless and should be removed.

3.3.22 Project Support

Project Support / Convenience

- By making surface transportation less expensive and more convenient, communities will come together in addressing common interests rather than existing in relative isolation and insularity.

Project Support / Socioeconomic

- Given the deteriorating demographics of Southeast Alaska, construction of the Lynn Canal road is a dire necessity if we are to survive economically and sociologically.
- By making surface transportation less expensive and more convenient, communities will come together in addressing common interests rather than existing in relative isolation and insularity.

3.3.23 Purpose and Need

- Redefine the purpose and need for this project to drop components like “reducing travel time” or “lowering user costs” to focus on more realistic criteria like improving regular predictable safe access for the public in Lynn Canal.
- If there are private mining operations interested in expanded roadworks, allow them to build at their own cost or suggest they build their own barge/ship docking facilities on site.
- Many on our side of Lynn Canal think that 2B is only for the benefit of the mine.
- Purpose and need should include criteria such as improving public transportation safety and reliability, promoting economic sustainability, minimizing environmental impact, and level of community support.
- It is a small group of special interests that want to build this road and everyone knows it.
- The study should outline the basis for all aspects of the purported project purpose.
- Alternatives must demonstrate the possibility that the road will reduce travel times between Juneau and the continental road system and costs to the State and travelers within a realistic time frame or they do not meet the project purpose.
- The cost components unduly restrict the Section 404 alternatives analysis and should be dropped from the purpose and need.
- Refine the purpose and need statement to emphasize delivery of transportation in a regular, predictable, and safe manner.
- The overall project purpose should be clarified in the Draft SEIS as it is unclear what would constitute surface transportation.
- Haines and Skagway deserve full consideration in transportation planning related to the Lynn Canal area, as do other Southeast Alaska coastal towns.
- The criteria used as the purpose for the project lead inevitably to the conclusion that building a road is the only way to meet the transportation needs of Lynn Canal; this is an improper conclusion.

Purpose and Need / Safety and Reliability

- I support a Purpose and Need Statement that includes safety and reliability.
- Both federal and state law recognize safety as a key factor in making surface transportation decisions.
- Safety is a significant issue: our long-range transportation plans include safety as primary considerations and goals.
- The purpose and need statement must address safety and reliability and should not include reducing state and user costs.

- Safety was basically only a cost issue in the 2006 FEIS and therefore needs to be updated and made part of the Purpose and Need.
- The focus of the project should include safety as a priority issue.
- To leave safety out of the Purpose and Need of the project seems to contradict Commissioner Luiken's statement to our State Legislators and the goals of the Southeast Alaska Transportation Plan.
- Without a safety and reliability assessment as part of the project purpose and need, Juneau access could actually decrease.

3.3.24 Socioeconomic Resources

- I am concerned that the EIS focuses unfairly on one community at the expense of others in Southeast Alaska.
- Travelers arriving on the Lower 48 and Prince Rupert ferries are important to the economies of Sitka and others, yet the newsletter did not mention impacts to Lower 48 routes.
- Compromising important habitat in Berners Bay and the east Lynn Canal area will have an adverse economic effect on tourism and fishing opportunities.

3.3.25 Threatened and Endangered Species

- Two candidates for listing as threatened or endangered species, the yellow-billed loon and Kittlitz's murrelet, use marine waters in Southeast Alaska.

Threatened and Endangered Species / Consultation

- NMFS expects that the FHWA will reinitiate consultation with NMFS concerning species listed under the Endangered Species Act.

3.3.26 Transportation

Transportation / Shipping Costs

- I understand that shipping is generally a more efficient form of transport than driving, so it may be incorrect to think we'll have cheaper goods in Juneau because of trucking.

Transportation / Transportation Connections

- Our general local travelers and tourists need to go to population centers, not to out-of-the-way places miles away from their destination.

3.3.27 Wildlife

Wildlife / Bald Eagles

- Construction, operation, and maintenance of the completed road will result in a persistent source of noise that will disturb bald eagles, which may cause them to change or abandon nesting sites.
- The SEIS must disclose noise effects to bald eagles and evaluate mechanisms to remedy the potential effects.
- Survey updates of nest locations should be conducted for the draft SEIS; SEACC suggests new aerial surveys of the entire project area.
- FHWA and DOT&PF should disclose and evaluate appropriate compensatory mitigation for

disturbances that cannot be avoided or mitigated including abandoned nesting sites.

- USFWS stated that no blasting or similar loud noises should be done within 1/2 mile of an active nest and aircraft should stay 1000 feet or farther from active nests.
- Compliance with the National Bald Eagle Management Guidelines is voluntary, not mandatory, but is very important.

Wildlife / Birds

- Birds use Berners Bay throughout the year; USFWS recommends using or upgrading existing development sites at Echo Cove or Cascade Point rather than development in new areas that could negatively impact shoreline-dependent birds.
- A USFWS report recommended against development of new facilities near sites where significant concentrations of birds were noted.

Wildlife / Marine and Anadromous Fish and Shellfish

- ADF&G has mapped herring spawn in Berners Bay and the surrounding area; this should be included in the SEIS and addressed to the extent any alternative would impact this resource.

Wildlife / Marine Mammals

- Marine mammals use Berners Bay throughout the year; a USFWS report recommended against development of new facilities near sites where significant concentrations of animals were noted.
- USFWS recommends using or upgrading existing development sites at Echo Cove or Cascade Point rather than development in new areas that would likely result in negative impacts to marine mammals.

Wildlife / Terrestrial Mammals

- Wildlife studies show that Berners Bay estuary is a high-use brown bear area, mountain goats winter at low elevations near saltwater, and moose and wolverine use more of the road corridor than originally thought.
- The SEIS should address additional measures to minimize impacts to wildlife during road construction and post-construction operation.
- Animal tracking information could be overlaid with road alignment drawings to determine if debris flow bridges provide wildlife movement corridors.
- Updated information should be included in wildlife technical reports appended to the SEIS.
- If the road alignment shift at Sawmill Creek includes a crossing over the falls it would prevent bear passage under the bridge.
- The Juneau Access road will provide opportunities for wildlife viewing.
- DOT&PF can use the Wildlife Technical Reports to determine wildlife high use areas and design for additional traffic congestion to prevent vehicle accidents.
- The SEIS should discuss to what extent DOT&PF will commit to wildlife monitoring during construction and operation.

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4. Scoping Comments and Preparation of the JAI SEIS

Scoping comments will be used to determine the issues to be addressed in the SEIS. All substantive scoping issues identified will be specifically addressed in the Draft SEIS once appropriate analysis is conducted. FHWA and DOT&PF have provided initial responses to agency scoping comments as a means to clarify how issues raised in their letters will be addressed in the Draft SEIS. Copies of these response letters are included in Appendix C-4, Responses to Federal and State Agency Scoping Letters.

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