



# Southeast Alaska Conservation Council

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November 4, 2011

## **Re: Comments on Southeast Alaska Transportation Plan's 2011 Update Scoping Report**

Andy Hughes  
Southeast Regional Planning Chief  
Alaska Department of Transportation and Public Facilities  
PO Box 112506  
Juneau, Alaska 99801-2595

Dear Mr. Hughes,

Thank you for considering the following comments from the Southeast Alaska Conservation Council (SEACC) in regard to the Southeast Alaska Transportation Plan (SATP) 2011 Update Scoping Report.

SEACC, a non-profit Alaska organization, is a coalition of 15 volunteer member groups based in 11 Southeast Alaska communities dedicated to safeguarding the integrity of Southeast Alaska's unsurpassed natural environment while supporting the sustainable use of our region's resources.

### General Comments:

The SATP 2011 Update Scoping Report highlights the transportation challenges faced in Southeast Alaska and explores six alternative plans to address convenience, capacity, and maintenance and operation issues the region faces over the next twenty years. SEACC continues to support a transportation system based on ferries, and we oppose the concept of restructuring Southeast Alaska's transportation from a safe and viable marine highway system to a fiscally unrealistic and potentially hazardous hybrid system dependent on a significant expansion of the existing road network.

We support exploring alternatives that direct transportation dollars toward sustaining and improving the region's ferry infrastructure to better address user demand, system capacity, and annual maintenance and operation costs. Moreover, we support Alaska's Long Range Transportation Plan policy in *Let's Get Moving 2030* to "develop transportation plans in close coordination with local communities to ensure transportation investment decisions reflect Alaskans' quality of life values." SEACC stands with the approximately 90% of public commentary received in 2004 in opposition to the transition

of a system based on ferries to one based on roads,<sup>1</sup> and we urge the Alaska Department of Transportation and Public Facilities (ADOT & PF) to adopt an SATP that reflects the quality of life values emphasized by local communities.<sup>2</sup> Furthermore, we are alarmed with transportation plan alternatives that call for discontinuation of the most frequently used and highest revenue-generating Alaska Marine Highway System (AMHS) routes, i.e. Lynn Canal and Bellingham.

Alternatives Comments:

SEACC supports some elements of both Alternatives 2 and 4. As recognized in Alternative 2, we understand the need for efficiency and aren't opposed to strategically reducing some service in order to keep the AMHS financially sustainable. We believe that this must be done thoughtfully and carefully because the ferry system is a lifeline for many Southeast Alaskan communities.

Considering money has already been secured for at least one Alaska Class Ferry (ACF), we encourage a transportation plan that incorporates ACF vessels into the system. It was reported in the Juneau Empire on September 20, 2011 that Alaska Ship and Drydock (ASD) was awarded the contract to design the first new Alaska Class Ferry, "which will give ASD a leg up on construction as well. ASD said that's likely to mean 129 full-time, year-round shipyard jobs, along with another 79 with suppliers and contractors in the local community."<sup>3</sup> By promoting a transportation system that utilizes more efficient Alaska Class Ferries designed specifically for our weather and seas, ADOT & PF can demonstrate to the region that it not only supports job creation independent of road construction, but that it also is willing to respond to public comments and enhance the values of our communities.

Although we support the general concept of Alternative 4, we oppose the construction of a new ferry terminal at Cascade Point in Berners Bay. In addition to increasing the cost and reducing the efficiency for travelers by moving the ferry terminal some 30 miles further away from downtown Juneau, the increased pressure and disturbance of essential fish and marine mammal habitat concerns us.

We must also maintain our connection with the lower-48, which means replacing one of the existing mainline ferries. We oppose discontinuing the Bellingham run, as proposed in Alternatives 3 and 5. Maintaining the Prince Rupert run as an alternative to Bellingham is unrealistic for hunters and military personnel traveling with firearms, as well as for other Americans who are restricted from driving through Canada. Additionally, maintaining only the Prince Rupert run would discontinue safe winter passage to Washington State for those traveling with vehicles and force travelers to negotiate hazardous winter driving conditions in British Columbia.

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<sup>1</sup> Source: 2004 SATP, page 112

<sup>2</sup> Source: *Alaska's Long Range Transportation Plan*,  
<http://dot.alaska.gov/stwdplng/areaplans/lrtpp/documents/SWLRTPPdraftexecsummary.pdf>

<sup>3</sup> Source: *Juneau Empire*, "State selects Ketchikan shipyards for role in building new state ferry,"  
<http://juneauempire.com/local/2011-09-20/state-selects-ketchikan-shipyard-role-building-new-state-ferry#.TrCjRPOr1aY>

We oppose discontinuing the Cross Gulf run; deck space on the Juneau - Yakutat route in 2010 ranged from 79.8 percent capacity to 82.7 percent capacity, depending upon the direction,<sup>4</sup> with similar deck space volume for the Yakutat - Whittier route.<sup>5</sup> Deck space for the Juneau to Whittier route was at 91.1 percent capacity in 2010.<sup>6</sup> Discontinuing the Cross Gulf route would not only eliminate runs operating under high capacity, but more importantly, discontinuation of service would leave the community of Yakutat high and dry. Reliable ferry service is an essential link for the City and Borough of Yakutat, particularly the commercial fishermen who depend on AMHS to get their fish to market affordably. Alaska DOT & PF stated in their SATP 2011 Update the objective “to meet basic needs” of Southeast Alaskan communities. Continuation of the Cross Gulf route, namely service to Yakutat, is essential for the State to continue to serve the needs of all its rural communities.

SEACC opposes Alternative 5, i.e. expand the basic highway system and use small shuttle ferry boats to bridge gaps in the highway system. Approximately 45% of all AMHS users are foot passengers.<sup>7</sup> The SATP 2011 Update fails to even acknowledge challenges to-be-faced by foot passengers under Alternative 5, the additional costs travelers will face to have reliable vehicles to reach their destinations, and the resulting decreased mobility and regional connectivity for many. It would be cost-prohibitive for many foot passengers to rely on personal vehicle or commercial transport between their communities and respective ferry terminals, i.e. Juneau to Katzechin or Kake to the southern end of Mitkof. We recommend that when exploring an alternative based on road construction and shuttle ferries, ADOT & PF address walk-on passengers and the challenges they will face directly. If ferry terminals are constructed at Katzechin, Warm Springs Bay, and the southern Mitkof Island, ADOT & PF should provide affordable public transportation to and from the new ferry terminals and incorporate those costs into the cost estimates for the project. Leaving this element out of the discussion will result in an inaccurate and incomplete analysis of user convenience, efficiency, and costs.

The approach outlined in Alternative 5 would replace a safe and reliable method of transportation in Lynn Canal with one that is unreliable, unsafe, and unnecessary. Alaska DOT & PF estimated that the East Lynn Canal Road would be closed due to avalanche and other weather-related issues 34 days per year,<sup>8</sup> resulting in continued maintenance and operation costs of a Lynn Canal ferry service during road closures. Maintaining two systems in Lynn Canal, road and ferry, would lead to higher M&O costs than the present system, thus defeating the goal of a financially sustainable transportation system. Unfortunately, this was left out of the discussion in Alternative 5. The combination of increased maintenance and operation costs associated with maintaining two systems in Lynn Canal along with decreased levels of reliability and safety contradicts the purpose and objectives for the SATP 2011 Update, and the *Let's Get Moving 2030* policies on

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<sup>4</sup> Source: 2010 Alaska Marine Highway Annual Traffic Volume Report, page 84

<sup>5</sup> *Ibid.*, page 85

<sup>6</sup> *Ibid.*, page 85

<sup>7</sup> Source: 2000 McDowell Marketing and Pricing Study, page 65

<sup>8</sup> Source: 2006 Juneau Access Improvement Project Record of Decision, page 3

System Development, System Preservation, System Management and Operations, Safety, and Environment and Quality of Life.

Comments on the Purpose and Need for the SATP Update :

The purpose and need statement focuses on “providing the most financially sustainable transportation system that resources permit.” We feel that purpose and need statement is inadequate; an essential part of the planning process should focus on providing a “safe and reliable” transportation system in addition to financial sustainability.

As mentioned in the purpose and need section, federal transportation dollars are expected to decline substantially in coming years. We agree with Alaska DOT & PF’s assessment and understand the need for more strategic and efficient ferry scheduling. However, the East Lynn Canal Road and shuttle ferry terminal project is prohibitively expensive. As of 2010, the project only had secured 12% of its funding, resulting in a near \$440 million project deficit.<sup>9</sup> With declines in federal funding, it is unrealistic to assume the state can secure a minimum of \$440 million to complete a 51 mile highway that connects people to another remote ferry terminal. Independent analysis provided evidence that ADOT & PF cost estimates of an East Lynn Canal Road were low and incomplete.<sup>10</sup> When considered in the context of a larger-scale plan that includes proposed roads on Baranof Island and Kupreanof Island and their corresponding shuttle ferries and terminals, it raises concern that the continued rising cost estimates of a single project—the East Lynn Canal Road mega project—could exhaust the budget for the entire Southeast transportation system and jeopardize future federal funds from reaching the region.<sup>11</sup> In a letter delivered to ADOT & PF in 2009, the US Department of Transportation expressed concern that “sufficient funds are not available from current recognizable sources to complete a number of large projects contemplated by the State’s program,” and expressed the importance of “fiscal constraint.”<sup>12</sup> It is no secret that Southeast Alaska has a long queue of expensive transportation projects and proposals. In a time of predicted declines in federal funding, hedging the maintenance and improvements of our region’s existing infrastructure against one unnecessary mega project indicates that ADOT & PF planners are not exercising fiscal restraint.

Moreover, as documented for discussion at the 2010 Alaska Regional Ports Conference, there is a lengthy list for ports and harbor needs for Southeast Alaska.<sup>13</sup> Rather than continued spending on unnecessary mega projects, we recommend focusing scarce transportation dollars on local needs that will directly benefit the residents of our Southeast Alaskan communities.

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<sup>9</sup> Source: *Easy to Start, Impossible to Finish*, page 3

<sup>10</sup> Source: *2005 Herra Environmental Consultants, Inc. Memorandum, Review of Highway Construction and O&M Costs for Alternatives 2 and 2C of the Juneau Access Improvements: Supplemental Draft Environmental Impact Statement*, Page 1-11, <http://seacc.org/files/herrera-report-final-exhibit-4.pdf>

<sup>11</sup> Source: *Easy to Start, Impossible to Finish*, page 4

<sup>12</sup> Source: *Letter from the Federal Highway Administration and the Federal Transit Administration to Alaska DOT & PF Commissioner Leo von Scheben*, November 4, 2009, <http://aktransportation.org/files/feds%20on%20fiscal%20constraint%2011.2009.pdf>

<sup>13</sup> Source: *2010 Statewide Ports and Harbors Needs List*, page 5 - 13

Comments on the SATP Update's Basic Tenets:

SEACC appreciates ADOT & PF's efforts to explore several alternatives for the future of transportation in our region. However, we disagree with the unproven assumption that new roads in Southeast Alaska will increase the use and capacity of our transportation system at a lower cost. Many residents and tourists in Southeast Alaska travel independently of automobiles. Creating longer distances for foot passengers between terminals and destination communities will limit mobility rather than increase it. Although travel by aircraft may provide a more efficient transportation alternative for some, many Southeast foot passengers travel with large quantities of goods and luggage, making it difficult and expensive to fly.

The AMHS has a safe and reliable record operating in Southeast Alaska, including Lynn Canal. The SATP needs to reflect the realities that travel by ferry between communities in the Southeast Alaska archipelago is safer and more reliable than traveling on roads with high frequencies of predicted avalanche and other weather-related closures.

Roads also generate a much more significant impact on the environment in terms of forest footprint, fish and wildlife habitat disturbance, increased hunting and trapping pressure on a variety of species, and scenic viewsheds. The department needs to internalize these costs into its alternative comparison to provide the public and decision makers with a reasonable basis for making these important policy choices.

Thank you for your consideration of our comments.

Sincerely,



Daven Hafey

Southeast Alaska Conservation Council