

Talking Points for Commenting on Supplemental EIS (SEIS) Scoping Report:

- Despite DOT&PF placing statewide emphasis on safety, the Juneau Access Improvement project purpose and need statement says nothing about providing safe, reliable, and predictable transportation in Lynn Canal. We feel DOT should redefine the project's purpose and need to address safety, predictability, and reliability and not focus exclusively on reduced travel times and user costs.
 - Over a 40-year period, DOT estimates 8 people would die on a Juneau road.¹ There would also be 600 non-fatal car accidents.² In over 40 years of operation, there have been no safety-related deaths on the marine highway.
 - The road would not be reliable in winter, and would be closed an estimated 34 days each year whenever danger for avalanches is moderate or greater.³
 - DOT has yet to analyze how many additional days the road would be closed due to the 112 rock, landslide and other hazards identified in 2006, after the Record of Decision was issued.⁴
- We feel that DOT&PF is approaching the new SEIS with a bias toward road construction, as reflected in their range of marine alternatives. All components of Alternative 4 (4A, 4B, 4C, and 4D) were ruled impracticable by the Army Corps of Engineers in the 2006 Final Impact Statement. These alternatives should be removed from the 2012 SEIS to direct analysis to viable solutions—the point of doing an EIS.
- The court-ordered ferry alternative is written as a variant of the “no-action” alternative in the project scoping report. This is a mistake and reflects a lack of emphasis on a full and fair analysis of how existing ferry resources could be used to address transportation needs in Lynn Canal. We recommend that the court-ordered alternative become its own alternative, rather than a variant of the no action alternative. In addition, we ask DOT and the FHWA to take a more in depth look at scheduling changes and other adjustments as part of this alternative.
- We support the construction of new Alaska Class Ferries, as we understand several of the Alaska Marine Highway System vessels are aging and need to be replaced. The State has commissioned the construction of at least one new Alaska Class Ferry, and requests have been made for up to two more vessels. Alaska Ship and Drydock in Ketchikan is in strong contention to build the new ferries that would improve marine transportation in Southeast. By constructing these new ferries in Ketchikan, approximately 200 high paying year round jobs would be created, and Alaskan dollars would be invested in Alaskan infrastructure and laborers.

¹ Final EIS 4-43 where 6 would die every 30 years

² April 2006 Record of Decision, page A-40

³ Final EIS at 4-46

⁴ Golder Report at Table 6

- We are concerned about the irreversible impacts road construction would have in Berner's Bay and associated impacts on herring and eucalon spawning habitat and the predators (humpback whales and Stellar sea lions) that depend on them. Berner's Bay is also congressionally categorized as Land Use Designation II, a "wildland" designation aimed to protect the wild and productive character of special places remaining in the US.
- Additionally, the Berner's, Lace, Gilkey, and Antler Rivers are all categorized as primary salmon producers by Alaska Department of Fish and Game. Road construction over these anadromous rivers has potential for negative impacts and would require expensive mitigation techniques.