



City and Borough of Sitka

100 Lincoln Street Sitka, Alaska 99835

Coast Guard City, USA

September 26, 2014
ADOT&PF Southeast Region
6860 Glacier Highway
Juneau, AK 99801-7999
Email dot.satp@alaska.gov

RE: SE Transportation Plan Comment

Dear DOT&PF Southeast Region:

Thank you for the extended comment period. City and Borough of Sitka (CBS) submits the following comments on the 2014 draft Southeast Alaska Transportation Plan. These are similar to those CBS submitted for your 2011 Southeast Transportation Plan Scoping Report. The draft plan still does not appear to present a comprehensive regional transportation plan. It makes recommendations on the Alaska Marine Highway System (AMHS) component but does not provide an analysis of the specific plan and impacts to replace aging vessels. Nor does it address long-term results and ongoing operational costs and benefits to be able to evaluate the real impacts on all communities in the AMHS.

The Transportation Plan should make a strong statement about the need for surface transportation links via the Alaska Marine Highway which connect the region to the North American road system via Prince Rupert and Bellingham. Page 1 states the most important role of AMHS is to provide transportation to passengers and vehicles between communities. Perishable commercial freight is also critical. Equally important, Southeast Alaska's economy requires a surface transportation link to the lower 48 states without having to travel through a foreign country. Also, seafood processors supporting the region's largest economic sector, commercial fishing, and suppliers shipping perishable foods depend on AMHS links between communities and Prince Rupert to be able to competitively ship their goods.

The Alaska Marine Highway is Southeast Alaska's only road to move people, goods, and services both regionally and inter-state, and it must function year round to enable the Southeast economy to thrive and its citizens to maintain their connections. The Baranof Road project is listed in the SATP with preliminary design scheduled for 2022 and construction after 2035. As a priority project, feasibility and basic questions about how the Baranof Road would function need to be determined in 2015, and the result should guide much more immediate development if the project is to proceed. How much of the year would the road be usable? Is a train a possible solution, and how would it work for vehicles and passengers? How would proposed service (and operations costs including road and remote terminal maintenance) compare to existing service? Without a more detailed analysis, it is impossible to determine that service will actually be improved—the reality might be less service and less connectivity to communities than offered by the current system; or it might greatly benefit the AMH System.

Sitka is an urban hub for many smaller communities in Southeast Alaska, especially as pertains to regional health care at the Southeast Alaska Regional Health Corporation's (SEARHC) hospital facilities. The SEARHC Mt. Edgecumbe Hospital is the largest employer in Sitka and provides critical health care services for these communities. When weather restricts air travel, the Marine Highway is the only link many have to vital health care services; yet Sitka receives only one northbound and two southbound ferries weekly for seven months of the year. A demand forecast would show Sitka is substantially under-served most of the year compared to Lynn Canal and other ports. This inequity needs to be addressed in the Transportation Plan.

Page 2, the SATP recommends the need to plan for periods of reduced funding, and discusses the three aging mainliners of the AMHS SE Fleet: Malaspina, Taku, and Matanuska and their retirement by 2024. The only new ferries planned for construction to replace these vessels are the two shuttle ferries proposed to run together in Lynn Canal and one SOLAS Class ferry to begin service in 2025. All three aging mainliners serve Sitka and the rest of the region. Reducing service to Prince Rupert is unacceptable since it provides a primary connection outside of the region. The issue of ferry deployment and replacement needs to be analyzed and discussed through a comprehensive, fully informed public process.

Aviation Recommendations, Pages 6, 9: The statement "the SATP is the appropriate forum for consideration of mode-specific major capital airport project needs. However, with some exceptions, the key components of the region's airport system are already in place." does not mention that Sitka's airport is the exception—it has no ability to expand. The 1999 Sitka Airport Master Plan included a project to fill the water area and develop new general aviation and lease lot areas to permit urgently needed airport expansion. With the relocation of Airport Road, this project should now proceed. Please include it in the Transportation Plan with implementation in the near future, unless it can proceed more immediately by other means.

Highway Recommendations, Page 11: Baranof Road: The FY'2016 City and Borough of Sitka Legislative Priorities requests "Equitable Sitka Alaska Marine Highway Service – City and Borough of Sitka continues to request that DOTPF and AMHS complete the Sitka Access Study in the near future to evaluate the feasibility, benefits and costs of developing a road connection to Chatham Strait, potentially in cooperation with the proposed Takatz Hydroelectric Project. Without this assessment to identify the best road corridor to the eastern side of Baranof Island, where a new terminal would be built, how the new system would operate year round including the distance, time, and feasibility to commute to and from the terminal, and the conceptual costs and benefits of such a project and impacts to ferry service to Sitka, it is impossible to evaluate whether the Baranof Road or other road connection to the mainline route makes practical sense and is worth the additional cost and time required to access the AMHS. Whatever is developed must provide consistent, connective Marine Highway service between Sitka and the rest of the Marine Highway System so critical to our economic future." Please complete this feasibility/scoping analysis in 2015 as a basis for re-prioritizing this project.

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Please note that the final feasibility study for the Takatz Lake Hydroelectric Project is complete and on the City and Borough of Sitka Electric Department website. Completion of the Takatz Lake Hydroelectric Project in conjunction with the Baranof Warm Springs Bay road could possibly save millions of dollars for both projects.

Please be advised in Environmental Protection Agency's notice of final rule (CFR Part 63) titled National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, all areas of Alaska not accessible by the Federal Aid Highway System (FAHS) were exempted from the new regulations, but Sitka is considered accessible to the FAHS through the Marine Highway System. The exemption results in cost savings of millions of dollars for Southeast communities in avoided costs for compliance. On page 11 of the SATP, there is intent to designate the Baranof Road a National Highway System route. We urge ADOT&PF to recognize this exemption and not inadvertently take action that may result in its elimination.

Marine Recommendations – The narrative in the Transportation Plan lists recommendations but does not include the dates and impacts. Some of this information can be found in the tables, but the discussion would be more meaningful if the narrative provided more information rather than having to cross-reference. The reference on page 12 states "Finally, a new fast ferry or conventional ferry (similar to the ACF) would be constructed as a replacement for one of the existing fast ferries, to be determined based on operational costs." Operational costs for a fast vehicle ferry are higher than conventional ferries. The original FVF Fairweather was planned as the "Sitka Shuttle" to enable improved service to Sitka without the constraints of tides in Sergius Narrows. When Lynn Canal is served by the shuttle ferries, the SATP should reconsider returning the fast vehicle ferry to the purpose for which it was originally intended—to be home-ported in and serve Sitka, at least for the next 20 year period of the current SATP.

The City and Borough of Sitka continues to recommend that DOT&PF consider modifying the SATP process to include the formation of a Regional Transportation Planning Organization (RTPO) to assist with the development of the SATP. The RTPO would provide a more equitable process to develop a broad community-supported sustainable transportation system for Southeast Alaska. Thank you for your consideration of these comments.

Sincerely,



Mark Gorman, Municipal Administrator

cc: Governor Sean Parnell
Senator Bert Stedman
Representative Jonathan Kreiss-Tomkins
Commissioner Pat Kemp, DOT&PF
Captain John Falvey, AMHS Manager
Verne Skagerberg, SE Aviation Planner
Andy Hughes, SE Planning Chief
Marie Haldemann, SE Planner
Sitka Assembly