

STATE OF ALASKA

SARAH PALIN, GOVERNOR

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

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February 20, 2009

RE: Gravina Access Project

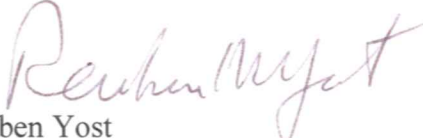
Dear Agency Representative:

We recently transmitted the *Gravina Access Pre-Screening Alternatives Memorandum* detailing the alternatives we propose to screen to determine the range of reasonable alternatives. Reasonable alternatives will be evaluated in detail in the supplemental environmental impact statement (SEIS) for the Gravina Access Project. At this time we are providing the attached *Draft Alternatives Screening Methodology* which explains the screening criteria we propose to use to screen alternatives.

Please review the proposed methodology and provide us with your comments. *If you have any comments or concerns regarding the methodology, please submit them in writing or via email no later than the close of business on Monday, March 23.* As explained in the previous letter, we are planning on holding an open house in Ketchikan to provide information on the pre-screening alternatives and the screening process on March 5, 2009. Input from the public and agencies will then be used to finalize the screening methodology and alternatives to be screened prior to conducting the actual screening.

Thank you for your continued participation in the Gravina Access Project. For more information, please feel free to contact me, at (907) 465-1774 or via email at reuben.yost@alaska.gov, or you may visit the project website at www.gravina-access.com.

Sincerely,



Reuben Yost
Project Environmental Coordinator
DOT&PF Southeast Region

cc: Mike Vanderhoof, FHWA Alaska Division Environmental Coordinator

"Providing for the safe movement of people and goods and the delivery of state services."

Distribution List:

Steve Brockman, Acting Field Supervisor, USDOJ – Fish and Wildlife Service
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Charles Denny, Mayor, City of Saxman
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Indian Tribes of Alaska
Chris McNeil, Sealaska Corporation
Frank Jones, President, Cape Fox Corporation
Karl Cook Jr., Mayor, Metlakatla Indian Community
Lee Wallace, President, Organized Village of Saxman

Gravina Access Project



Draft

Alternatives Screening Methodology



**Alaska Department of Transportation & Public Facilities
Federal Highway Administration**

**FHWA-AK-EIS-03-01-F
DOT&PF Project 67698
Federal Project ACHP-0922(5)**

February 2009

1. INTRODUCTION

Gravina Access Project Overview

The Federal Highway Administration (FHWA) in cooperation with the Alaska Department of Transportation and Public Facilities (DOT&PF) has identified a need to improve access between Revillagigedo Island and Gravina Island in Southeast Alaska (see Figure 1 at the end of this memorandum). The Gravina Access Project was one of 17 high priority projects funded in the state by the 1998 Transportation Equity Act for the 21st Century.

The FHWA, in cooperation with DOT&PF, evaluated six bridge alternatives, three ferry alternatives, and the No Action Alternative in the *Gravina Access Project Environmental Impact Statement* (EIS). The Final EIS, which was distributed to the public and federal and state agencies on July 30, 2004, identified Alternative F1 as FHWA's and DOT&PF's Preferred Alternative. Alternative F1 would cross Tongass Narrows via Pennock Island with two bridges: a 200-foot-high bridge over the East Channel and a 120-foot-high bridge over the West Channel. FHWA issued a Record of Decision (ROD) on September 15, 2004, that identified Alternative F1 as the Selected Alternative.

In 2006, DOT&PF initiated construction of the Gravina Island Highway (GIH) as the first phase of construction of Alternative F1. The GIH connects to the existing Gravina Island road network at the intersection of the Airport Access Road and the Lewis Reef Road. The GIH provides access to the approximate location of the F1 Alternative West Channel bridge abutment. Construction of the GIH was completed in 2008 and the road is open for public use.

In September 2007, subsequent to the approval of the Gravina Access Project Final EIS and ROD, Alaska Governor Sarah Palin determined that the funding of the selected alternative (F1) was not financially feasible and directed DOT&PF to look for the most fiscally responsible alternative for access to the Ketchikan Airport and Gravina Island. As a result of this decision, DOT&PF has initiated a supplemental environmental impact statement (SEIS) process to reassess reasonable alternatives, including new alternatives or variations that have been discussed since the original EIS was published. Alternatives considered in the SEIS will include the GIH in the evaluation of impacts.

Document Purpose

To develop an EIS, DOT&PF and FHWA must identify a range of alternatives that will be evaluated in detail. The National Environmental Policy Act (NEPA) requires the federal action agencies to evaluate all "reasonable alternatives" that would satisfy the project purpose and need and, if there are many possible alternatives, to evaluate a full range of the alternatives (see Section 2). DOT&PF & FHWA will determine whether any of the potential build alternatives are not "reasonable" through a screening process. The purpose of this document is to explain how DOT&PF and FHWA identified the alternatives to be screened and to establish the factors DOT&PF and FHWA will use to screen the alternatives.

The screening criteria used by FHWA and DOT&PF, as well as the alternatives to be screened, will be finalized after coordination with the participating and cooperating agencies and the public.

2. REGULATIONS, GUIDANCE, AND STANDARDS

An SEIS will be prepared for this project in accordance with NEPA, which requires federal agencies to prepare an environmental impact statement prior to approving a federal action that may have a significant impact on the environment. As part of the NEPA process, a number of alternatives will be considered to satisfy the purpose and need for the project. The Council on Environmental Quality (CEQ) refers to the alternatives analysis section as the “heart of the EIS,” and requires agencies to:

Rigorously explore and objectively evaluate all reasonable alternatives and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated. (40 CFR 1502.14a).

The NEPA process must consider a range of alternatives, describe the reasons that some are eliminated from detailed study, and then evaluate all reasonable alternatives in the environmental document.

FHWA relies on guidance from Technical Advisory T6640.8a in the preparation of an EIS. Regarding the alternatives in the EIS, the guidance requires that:

The draft EIS must discuss a range of alternatives, including all “reasonable alternatives” under consideration and those “other alternatives” which were eliminated from detailed study (23 CFR 771.123(c)). This section should begin with a concise discussion of how and why the “reasonable alternatives” were selected for detailed study and why “other alternatives” were eliminated. (FHWA 1987).

Finally, the “Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users” (SAFETEA-LU) passed in 2007 requires that participating agencies and the public be provided with opportunities to provide input in developing the alternatives. Moreover, SAFETEA-LU requires the lead agencies to determine, in collaboration with participating agencies, the appropriate methodologies to be used and the level of detail required in the analysis of alternatives.

3. METHOD USED TO IDENTIFY ALTERNATIVES FOR SCREENING

Based on the original 2004 EIS, comments heard during public and agency scoping for the SEIS and additional work performed after the 2004 ROD, 15 build alternatives are anticipated to be screened for inclusion in the SEIS (see the 2/5/09 Gravina Access Project Pre-Screening Alternatives Memorandum for more information on the 15 alternatives). Alternatives that sufficiently meet the project’s purpose and need and are feasible based on technical, economic, or environmental factors will be designated reasonable alternatives and evaluated further in the SEIS. The following paragraphs summarize how DOT&PF identified the 15 alternatives.

DOT&PF initially developed 18 build concepts for crossing Tongass Narrows as part of the original 2004 EIS. These concepts were based on previous studies, input from agencies and the public, engineering, and the purpose and need for the project. These build concepts were screened for several factors that included the ability of the alternative to meet the project purpose

and need, cost, environmental impacts, impacts to Section 4(f) properties¹, and transportation impacts. Ten options were not considered practical or feasible from a technical and economic standpoint and were eliminated from further consideration, which resulted in nine build alternatives (after one was divided into a low and high bridge option) considered reasonable and evaluated in the 2004 EIS.

Several of the original alternatives ultimately had costs greater than Alternative F1, the 2004 selected alternative now considered too expensive to be constructed. Given that these alternatives would clearly remain too costly, they will not be re-screened. However, modified versions of two of the alternatives—a tunnel and two movable-span bridges—are proposed for screening since they address concerns raised during SEIS scoping.

During screening of alternatives for the original EIS, one high bridge in the vicinity of the airport was determined to be an unnecessary variation of other high bridges in the same vicinity. It continues to be an unnecessary variation and will not be re-screened.

The last of the originally dropped alternatives was a ferry alternative that was determined not reasonable because it did not meet the project purpose and need and impacted Section 4(f) properties. Nothing has changed relative to purpose and need or Section 4(f) impacts related to this alternative. Therefore, this alternative will not be re-screened. All ten of the originally dropped alternatives and the reasons why they were dropped will be discussed in the new screening report and in the SEIS.

DOT&PF has explored potential cost savings by changing some of the original design parameters (design speed, extending fill into the water to shorten structure length, greater encroachment into FAA's Part 77 airspace, adjustment of marine vessel track lines, use of different component or structure types, delay in implementation of some features, etc.) to develop variations for consideration in the screening process. DOT&PF has also designed new or modified alternatives to address SEIS scoping comments.

The six new or revised alternatives include:

- Alternative C3-4 (a single variant of the previous Alternatives C3[a] and C4)
- F3v (variant of F3)
- G4v (variant of G4)
- M1 and M2 (two new movable bridge alternatives)
- T1 (a new tunnel alternative)

These six will be combined with the nine original alternatives for the screening process. The nine original build alternatives from the 2004 EIS are as follows:

- Alternative C3(a)—200-foot Bridge Between Signal Road and South of Airport Terminal
- Alternative C3(b)—120-foot Bridge Between Signal Road and Airport Terminal

¹ Section 4(f) properties are certain parks, recreation areas, waterfowl and wildlife refuges, or historic sites. Federal Department of Transportation agencies are forbidden by law from using land from these properties unless the action includes all possible planning to minimize harm and there is no "feasible and prudent" alternative, or a determination is made that the use will have only a *de minimis* impact (23 CFR 774.17).

- Alternative C4—200-foot Bridge Between Tongass Avenue (North of Cambria Drive)
- Alternative D1—120-foot Bridge Between Tongass Avenue (near Existing Ferry) and Airport Terminal
- Alternative F1 (DOT&PF and FHWA Preferred Alternative)—Bridges (200-foot East and 120-foot West) Between Tongass Avenue and Airport, via Pennock Island
- Alternative F3—Bridges (60-foot East and 200-foot West) Between Tongass Avenue and Airport, via Pennock Island
- Alternative G2—Ferry Between Peninsula Point and Lewis Point
- Alternative G3—Ferry Between Downtown and South of Airport
- Alternative G4—Ferry with New Terminals Adjacent to Existing Terminals

4. SCREENING CRITERIA

There are a number of reasons an alternative might be eliminated as not reasonable during the screening phase:

1. An alternative does not sufficiently meet the stated purpose and need of the project.
2. An alternative is determined to be an unsafe engineering risk (not feasible to build as a matter of sound engineering judgment) or to cost an unreasonable amount.
3. An alternative has unacceptable impacts to the natural, social, or economic environment that cannot be avoided, minimized, or mitigated and therefore would not be permitted.
4. An alternative substantially duplicates another alternative; that is, it is otherwise reasonable but offers little or no advantage for satisfying the project purpose and it has greater impacts and/or costs than other similar alternatives.

The proposed screening factors for alternatives include purpose and need, cost, Section 4(f) impacts, and unacceptable/unpermittable impacts. These screening criteria are described in the sections below.

Purpose and Need

The purpose of the Gravina Access Project is to “improve surface transportation between Revillagigedo Island, home of the Ketchikan Gateway Borough, City of Ketchikan and the City of Saxman, and Gravina Island, the location of the Ketchikan International Airport and adjoining lands that offer recreation and development potential.” Three needs are identified:

- To provide the Ketchikan Gateway Borough and its residents more reliable, efficient, convenient, and cost-effective access for vehicles, bicycles, and pedestrians to Borough lands and other developable or recreational lands on Gravina Island in support of the Borough’s adopted land use plans.
- To improve the convenience and reliability of access to Ketchikan International Airport for passengers, airport tenants, emergency personnel and equipment, and shipment of freight.

- To promote environmentally sound, planned long-term economic development on Gravina Island.

Each alternative will be screened based on how well the alternative meets the purpose and need for the project. Specifically, criteria will include:

- Efficiency to users in the form of transit time to the airport and other notable points on Gravina Island (e.g. private lands and recreation destinations).
- Cost to users of transit to the airport and to notable points on Gravina Island.
- Reliability of transit across Tongass Narrows: Frequency and forecast likelihood of closure for any reason.
- Ability to support Ketchikan Gateway Borough planned economic development on Gravina Island, expressed in terms of areas or road extensions likely to be developed, as conceived in the Borough's Gravina Island Plan.

Costs

Each alternative will be screened on the basis of construction cost, operation and maintenance costs, and life cycle costs. The cost ceiling for project alternatives will be set by DOT&PF and FHWA after public and agency input on alternatives to be screened and screening methodology.

Section 4(f) impacts.

Section 4(f) of the Department of Transportation (DOT) Act of 1966 is codified in Title 49 U.S.C. Section 303 and Title 23 U.S.C. Section 138. Commonly called "Section 4(f)," the law stipulates FHWA and other federal DOT agencies cannot approve the use of land from publicly owned parks, recreation areas, or wildlife or waterfowl refuges, or from historic sites unless:

- There is no feasible and prudent alternative to the use of land.
- The action includes all possible planning to minimize harm to the property resulting from use.

In August 2005, Section 6009(a) of SAFETEA-LU simplified the process and approval of projects that have only Section 4(f) de minimis impacts on lands. Under the new provisions, if the US DOT determines that a transportation use of Section 4(f) property results in a de minimis impact, and if the officials with jurisdiction over the property agree, analysis of avoidance alternatives is not required. Also, new regulations at 23 CFR 774 have clarified Section 4(f) procedures for FHWA. These changes have occurred since the 2004 FEIS and ROD.

For the SEIS screening process, alternatives will be screened to determine their likely use of properties definitively identified as lands subject to Section 4(f) protection, and to determine whether any alternative that does use Section 4(f) property can be reasonably modified to avoid the protected property. If at least one otherwise reasonable alternative avoids all Section 4(f) properties, or can be modified to avoid such properties, any alternative that does use Section 4(f) property will be eliminated as not reasonable.

Environmental or Socioeconomic Impacts Large Enough to Preclude Consideration

Tongass Narrows is a sheltered marine channel known for its fish and wildlife, including species protected by the Endangered Species Act, and high value habitat with protection under the Magnuson-Stevens Fisheries Conservation and Management Act and the Clean Water Act. The Narrows also accommodates a large volume of commercial marine traffic. If an alternative would create unacceptable and unavoidable adverse impacts to sensitive habitats or protected species or an agency with jurisdiction by law has indicated an alternative could not be permitted, that alternative may be determined not reasonable.

5. PUBLIC PROCESS RELATED TO IDENTIFICATION OF REASONABLE ALTERNATIVES

The alternatives screening methodology and the results will be reported to the public and agencies prior to advancement of the SEIS. Review by the public and agencies will help to ensure that no issues are overlooked. Public and agency review will provide confidence that the SEIS proceeds with a range of reasonable alternatives that meets the intent of NEPA.

Public and agency review will include:

- DOT&PF and FHWA will submit the screening methods memorandum to cooperating and participating agencies to solicit input on the proposed methodology. The agencies will have 30 calendar days to provide comments and input on the screening methods.
- DOT&PF and FHWA will provide a comment response summary to the agencies after the comment period has ended.
- DOT&PF and FHWA will host three public meetings in Ketchikan to solicit comments. These meetings will be publicized with at least 15 days notice in the local newspaper, on the project website, and with flyers. Two meetings will be held on March 5, 2009, and another meeting has been tentatively scheduled for May of 2009.
- A newsletter will be distributed to the public and agencies describing the screening process.
- Notification of the results of the screening process will be sent to everyone on the project mailing list