

September 24, 2011

Tongass Conservation Society, a long standing conservation group with members throughout Alaska and the lower 48, appreciates the opportunity to submit the following comments on the proposed Ketchikan to Shelter Cove Road. Although TCS recognizes that a recent survey identified a need for recreational and subsistence-related activities in the land surrounding this road, we question that the 10 million dollars earmarked for this project will be sufficient to complete this project. In addition, we have concerns about the impacts on habitat and wildlife.

Alternative I, the High Road corridor, follows the USFS reciprocal easement but has many disadvantages. This corridor will traverse a steep slope northeast of Harriet Hunt Lake and will require extensive road work. Although Alternative 1 is the shortest route, it will be expensive in terms of building and maintenance costs. TCS recommends not choosing this alternative since it will impact wetlands, and affect critical wildlife habitat areas close to Leask Lake. Leask Lake has been substantially degraded by timber harvest on the Mental Health Trust land, is adjacent to the Naha Wilderness Area and should not be further impacted. After passing through the Naha Reserve, this road cuts across a corner of Old Growth Reserve. The Old Growth should not be entered for any reason; it was set aside specifically to protect important habitat; road building will further segment this area.

Alternative 2, the Low Road corridor, crosses Cape Fox land into the Mental Health Trust, loops south through State land close to George Inlet before joining up with the Shelter Cove logging road inside the Old Growth Forest. As stated in the DOT packet, because existing logging roads are utilized, the last part of new road construction is required but there will be higher costs because of right-of-way purchases. Since the impacted area of the old Growth Forest is a peninsula close to Salt Lagoon, a rich area for wildlife would be severely impacted by this road. The alternative will require ground cuts along Leask Cove and Bat Cove that will require stabilization but will also lead to long term erosion. There is no information on the three roads around Harriet Hunt Lake and how they will impact the wilderness character of the canoe tour sponsored by Alaska Travel Association. The public needs specifics on what problems will arise as a result of road building and mitigation measures that will be in place.

Alternative 3, the High-Low corridor is 22 miles long and avoids the Naha Reserve. The cuts and fill combined with slope protection caused by traversing the ridge northeast of Harriet Hunt Lake and the north coast of Leask Cove make this the most expensive corridor with the most miles of new road construction. Ten million dollars will quickly be spent with this alternative. In Ketchikan, residents on both South and North Tongass have witnessed what happens on road edges that have been denuded. The remaining stumps cannot hold the heavy wet soil which then slides and blocks the road. Soils in Southeast Alaska are not firmly anchored and are prone to erosion for many years.

Alternative 4 the Low-High corridor follows the White River Road to Leask Cove, turning north to enter the Naha Reserve, cutting through the Old Growth Reserve before

linking with the Shelter Cove Road. The terrain is less difficult, and this Alternative is the lowest cost alternative for road building but expenses would accrue with the acquisition of a right-of-way along the White River road. Once again, the Old Growth area is negatively impacted by a road and therefore this alternative should not be selected.

The impacts to Salt Lagoon as a result of this project must be considered. Salt Lagoon is important to wildlife; during winter when lakes freeze, resident geese depend on the tidal marshes for food and protection. Also, creeks that drain into Salt Lagoon have pink, chum and coho salmon runs that depend on an intact ecosystem. Roads throughout the Tongass erode for years and Salt Lagoon will be less attractive to wildlife because of the road system.

Since Revillagigedo Island has been heavily logged, a more thorough study of habitat and wildlife should be done before this project proceeds, including attention to direct, indirect and cumulative impacts. TCS specifically requests information on deer habitat and populations in this area, including, for example, the loss of winter deer habitat on the northern end of George Inlet, resulting from past logging Mental Health Trust land.

TCS requests that DOT give an estimate of what each option would cost when the road is complete. We believe the available ten million dollars will be quickly absorbed long before any of the alternatives is complete. In addition, this project would produce only a 14' wide road. The tourist industry will certainly utilize a road which will present difficulties when large vehicles meet and one of them must back into a pullout. The current White River Road, a one lane road, has created such problems as has the road along Whipple Creek into Adventure Karts. After a rainfall, potholes develop and the road degrades quickly.

Since this road is a possible link to the Cassiar Highway, as identified by the 2004 Southeast Alaska Transportation Plan (SATP), it is necessary for DOT to also analyze the impacts that an enlarged road system would cause.

Tongass Conservation Society asks that the no action alternative be adopted. Ketchikan can best rely on the existing means for accessing George Inlet and avoid the long-term impacts this project would cause.

Thank you for your consideration.

Victoria McDonald for
Tongass Conservation Society
Box 23377
Ketchikan, AK
907 254 0914