

Feb. 18, 2020

Hello Mayor and Assembly Members,

I ask that you support proposed Resolution 2020-01 opposing the expenditure of millions of State of Alaska funds for the Kake Access Road project. It is a colossal waste of public funds which could be better spent on legitimate needs.

This project, in one form or another, has been debated, studied, and abandoned numerous times in the last few decades. Quite simply, it does not pencil out, given the demographics and highly speculative benefits—especially now in a time of austerity for all Alaskans.

By some undisclosed stroke of political maneuvering, this latest project iteration was excluded from any EIS requirement. However, it is the poster-child for project “piecemealing,” as wisely outlawed under NEPA.

The latest iteration of this boondoggle includes no ferry or ferry terminal as was included in the 2013 version, which in reality makes it a road to nowhere, ending at 12-Mile Creek. The ultimate goal is to link the road to the City of Kupreanof and Petersburg.

Rather than rehash many identical issues from 2013 as now, I include here a few excerpts from my 2013 comments which seem to be most applicable to the current proposed project and addresses some of the underlying issues:

—There is no doubt that Kake is isolated, that adequate medical services are lacking, and that the price of goods and services are high. However, this situation is not unique to Kake and is the circumstance of most communities in SE and greater Alaska. I believe an honest environmental analysis will conclude that a road will not improve Kake’s troubles, and in fact will result in negative impacts to all the affected communities of Kupreanof and Petersburg as well as Kake.

—...it is apparent that this project is a pie-in-the-sky fantasy of a few powerful legislators who control State purse strings and thus their own personal legislative priorities.

—A comparison of the South Mitkof Ferry Terminal to the proposed Kake Access Project:

....Despite warnings by the public early on, the South Mitkof Ferry Terminal was an expensive and abysmal failure. It barely operated and has been closed for years although approximately \$20 MM (maybe more) was invested in the facility including extension of a paved road ending at the terminal. It was an expensive experiment.

"The Mitkof facility was intended to serve a much greater population base than the Kake project yet it did not survive the lack of ridership despite a second attempt after the first and operation under new management. A nearly new facility, it sits completely empty today as it has for years. Given the utter failure of the S. Mitkof facility, I have little confidence that a Kake Access road extension and ferry facility to Petersburg will succeed. I predict, that if it is approved, it will also fail but the losses will be more staggering than for the S. Mitkof project.

Do we learn any lessons from the past or is this just another symptom of insanity?

—Demographics 101

The demographics for a Kake to Petersburg road link simply do not justify construction of a multi-million dollar road for a community of 500 people. And this is not to mention the environmental impacts associated with a project of this size.

The waters of SE Alaska are our "highway", don't require maintenance, are safe for ferry travel, and experience little to no environmental impact from traveling upon them. Many of Kake's woes would be rectified if the political will to provide better mainline ferry service existed.The State should provide improved mainline ferry service, especially in the winter – not an expensive road/ferry crossing that links communities.

—Fiscal Waste

The proposed project is a colossal waste of public money and time. ...Considering the current population of Kake, the appropriation amounts to a per person subsidy of \$80,000. This figure will no doubt increase dramatically if a road is chosen over improved mainline ferry service since the cost of road construction and shuttle ferry infrastructure will no doubt far exceed the initial appropriation. Simple logic should prevail by eliminating the construction of a Kake road link from further consideration.

— The cost/benefit effectiveness should be identified as a significant issue in driving alternative development and the full costs of the project should be disclosed. This includes the entire cost of the project including all associated infrastructure including but not limited to the entire cost of planning and environmental analysis, construction, Lidar transects, potential shuttle ferries and docks, staffing, overhead, administration, year 'round maintenance including snow removal and prevention of blocked culverts that impede fish passage - a chronic problem on the Tongass National Forest which the Feds cannot even afford to remedy.

The State DOT continually experiences budget shortfalls that prevent it from adequately maintaining our local road systems, especially during periods of

abundant snowfall. Consequently, I have little confidence that they will adequately maintain the 40-plus miles to Kake.

—....is there any real benefit to Kake residents from driving a bumpy and dangerous road to Petersburg to access a jet, when they could just fly from Kake?

—Following are my responses to various individual assertions [in red] made in the Draft Purpose and Need Statement:

“Kake residents currently lack timely and affordable access to advanced medical care and facilities as well as a wide variety of essential commercial sales and services to support community well-being.”

No doubt everyone in smaller communities in SE Alaska believe this to be true, however it is not implicit that Petersburg can adequately meet those needs, since it fails to supply many of the services that even Petersburg residents seek. While I fully support local business, the realities of life in rural Alaska dictate to “do without” or travel elsewhere to meet our needs.

For instance, our medical center cannot perform surgeries, nor can expectant mothers give birth here, unless the mother happens to deliver prematurely. Petersburg likely experiences per capita a similar rate of medi-vac flights as Kake residents not to mention the temporary translocation of patients to larger communities for needed medical treatment. Petersburg has no ophthalmologist. Visiting vision specialists make regular visits (~ every 2-3 months) to Petersburg, however appointments must be booked weeks in advance. ...Nor is there a hearing specialist in Petersburg – a need cited by a Kake resident during their listening session. Granted, some Kake residents may find medical services in Petersburg meet their needs, but I would be willing to bet the vast majority would not.

Our town has quite limited options for car repairs, the incidence of which will likely increase due to driving 40 plus miles on a bumpy, poorly maintained road. Car repair facilities in Petersburg have inadequate ability to diagnose issues arising from malfunctioning electronics found in the newer models. As a result, many Petersburg residents put their cars on the ferry to Juneau for service [ferry service is now greatly diminished]. And they combine that with a trip to Costco and Home Depot loading their cars to the max with the less expensive goods they find there.

While less expensive than Kake for groceries, Petersburg does not compare to Juneau in most respects. Any assumption that the majority of Kake residents would really prefer to do their shopping or fulfill their medical needs in Petersburg needs serious fact-checking. They simply are not going to regularly drive that distance for a loaf of bread and a gallon of milk. Moreover, ridership on a shuttle ferry across the Wrangell Narrows will never cover the cost of operation

as the Inter-island Petersburg to Wrangell/Coffman Cove facility demonstrated. And when a medical emergency arises, Kake residents will likely enlist Native health services and air transport rather than drive the distance to Petersburg with an ill patient, especially if they will likely be required to fly to a larger town anyway for treatment. When examined at any depth other than superficial, it is clear that Petersburg cannot fulfill the needs of Kake residents at a level that justifies construction of a road and ferry crossing to Mitkof Island.

“The cost of air travel [from Kake] to Juneau and Sitka generally exceeds \$150 each way per person, with potential of added baggage fees. This amount is not affordable for many residents of Kake,... From Juneau, Sitka, and Petersburg, the travelers can board Alaska Airlines to all of the larger communities in Alaska and the lower 48 states.”

A fare check, two weeks out for airfare on Alaska Airlines from Petersburg to Juneau shows a cost of \$160 each way – more or less depending on the day of travel, so any assumption that Kake residents would choose to drive to Petersburg to catch the one AM northbound flight per day to Juneau, again has no basis in reality. They would have to either overnight in Petersburg, or depart very early from Kake incurring fuel costs for the trip, find a place to leave their car (another expense) and pay a similar or higher fare than they currently do. The same baggage restrictions apply. Any sensible Kake resident would chose to save the time, the fuel and the hassle of driving to Petersburg, and instead fly to directly Juneau to connect with other flights and/or shop and seek medical treatment where goods and services are better. Granted, some Kake residents may find medical services in Petersburg meet their needs, but I would be willing to bet the vast majority would not and again not at a level that justifies construction of a road and ferry crossing to Mitkof Island.

“The economy of Kake is centered on the area’s fisheries. The nearest major fish processors are in Petersburg. Transporting fish by boat to those processors from the fishing grounds west of Kake is expensive in terms of fuel and time; the time required for boats and personnel to transport fish to Petersburg (approximately 10 hours round trip) decreases the cost-effectiveness of fishing near Kake.”

Anyone that understands fish processing understands that multiple handling and elevated temperatures are the most significant causes of declines in fish quality and consequently price. My family depends 100% on commercial fishing for our livelihoods and can say unequivocally, that we prefer our fish be transported to the processor in our fishing vessel, or a fishing tender if our capacity is exceeded. This is the most efficient and timely method of transporting fresh fish and maintains quality at its highest level. Fish are suspended in slush ice or refrigerated sea water, maintained at 34 degrees F or so, and generally handled only once prior to reaching the processor.

Compare this to the rigors of multiple loading and off loading from fishing vessels to totes on docks, the time it would take to properly ice each fish, load on surface vehicles, and then transport on AML sized refrigerated vans along 40 plus miles

of poorly maintained roadway. Clearly, this proposal is DOA. A recent two-day seine opening yielded 8 MM salmon. And the 2013 season forecast predicts a 54 MM pink salmon harvest in SE Alaska alone. If fish were offloaded in Kake I shudder to imagine the headache of transporting only a fraction of this volume via a road system.

,,,please dispel any myth that transporting fish from Kake to Petersburg along a 40 plus mile stretch of road is a viable option. Combine this with the dozens of fish tender captains and crews that would potentially be displaced and I can conclude without doubt this notion is not viable. Please remove any reference to transport of commercially landed fish along a Kake road link from your P & N Statement.

Kake has a fish plant built during the 1980"s. The facility has gone bankrupt twice I believe. Attempts over the years at reigniting the plant to a viable operation have consistently failed.

“Opportunities for these activities [subsistence] are mostly limited to accessible beaches and logged land adjacent to local logging roads extending out from Kake. Extending the road system out from Kake would expand the area available to subsistence food gatherers. There are 120 miles of logging road in the Kake area...”

As noted in the P & N Statement 120 miles (or .22 miles per person) are available in the area for subsistence purposes. Expanding the road system will not necessarily result in a net benefit to Kake subsistence users. In fact, increased road density is likely to harm the primary subsistence resources of deer and moose due to increased access and competition from other federally qualified subsistence hunters as well as sport and non-resident hunters. Expansion of the existing road system in the project area will create a relatively large area that is easily accessed from local communities. I believe Kake residents are very aware and wary of this possibility.

Subsistence uses are not “limited” to “logged land adjacent to local logging roads” contrary to that assertion in the P & N Statement.

Brinkman (2007) surveyed deer hunters on Prince of Wales Island and reported that the median distance that hunters were willing to walk from their vehicles to hunt deer was about 2.4 km (1.5 miles).¹ Moreover, unroaded, old growth forest provides significant if not more subsistence resources than those found along roaded and existing clearcuts and act as reservoirs for old growth dependent species such as Sitka blacktailed deer, wolves goshawks, murrelets and marten.

¹ Brinkman, T. J. 2007. The Prince of Wales Island deer hunter project: preliminary summary of hunter survey responses. University of Alaska Fairbanks, Fairbanks, AK, USA.

While the Kake Access road as currently planned is intended to end at the unprotected waters of Fredrick Sound, it is ultimately a "connected action" to a road traversing the North end of Kupreanof Island and somehow to link to Petersburg. It is pie-in-the sky and should be rejected not only due to its exorbitant costs but also due to its supposed benefits with no bias in reality.

Thank you,

Rebecca Knight

Rebecca Knight

Peterburg Resident