Record of Decision
Sterling Highway Milepost 45–60 Project

State Project No: 53014
Federal Project Number: STP-F-021-2(15)

Appendix A: Responses to Comments on the Final EIS
May 2018

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ID: 1321 **Source:** Web **Date Submitted:** 3/11/2018
Name: Janet Yaeger
Organization:

I am greatly distressed to read that the route selected in the draft EIS, G South, has been rejected. Although expensive, G South involved the least redirection of the highway and had the lead impact on the wilderness character, recreational opportunities and wildlife that are the reasons people choose to live on, and visit, the Kenai Peninsula. I believe that the Juneau Creek alternative makes a poor sacrifice in valuing money over that which is beyond value and irreplaceable once lost: the wild character of this amazing place. In addition, the Juneau Creek alternative destroys a vital migration corridor for brown bears (and other wildlife), which are already under siege from habitat loss in the area. I strongly disagree with this decision and urge you to go back to the original preferred alternative, G South.

RESPONSE: While less expensive, the Juneau Creek Alternative was not selected based on costs. DOT&PF and FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives. The values associated with the Kenai River were given greater weight based on input from the public and agencies. The G South Alternative would require a new bridge over the Kenai River and routes highway traffic close to the river for a greater length compared to the Juneau Creek Alternative—these are among the reasons DOT&PF and FHWA did not select the G South Alternative in the Record of Decision (ROD). Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1322 **Source:** Web **Date Submitted:** 3/11/2018
Name: Marvin Ebnet
Organization:

I am absolutely in FULL support of the Juneau Creek bypass. It is the cheapest, can be built with little effect to normal traffic, and it simply makes sense to move it away from the river and NOT have to build any bridges. I think cooper landing can actually become a more desirable quaint area to stop for those that wish to, it can become a mecca of sorts. The State and Agencies simply need to 'bite the bullet' and DEAL with the necessary paperwork associated with the 33 acre wilderness designation in the Kenai National Wildlife Refuge. Do your JOB and do the right thing. YES on Juneau Creek

RESPONSE: Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1331 **Source:** Web **Date Submitted:** 3/12/2018
Name: Robert Estes
Organization:

This highway re-routing should have been completed 20 years ago

RESPONSE: Comment noted.

ID: 1332 **Source:** Web **Date Submitted:** 3/12/2018
Name: Candie Graham
Organization:

I am only a part-timer to Cooper Landing but I like this route. It seems the best that can be done to protect the river through this precarious area of the Sterling Highway and will hopefully put the dangerous navigation behind us and offer an alternate route should there be an accident that prevents normal passage otherwise. The Juneau Creek route looks to afford the locals some respite from the constant drone of traffic on their roads and allow them to more safely navigate through their daily lives while driving from one place to the next. It should also open up the "Old Seward Highway" to become a more walk-able, usable span of the roadway, it would be nice to see the property owners through this area able to take advantage of the situation to where they could create a true off the highway river destination.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1337 **Source:** Email **Date Submitted:** 3/13/2018
Name: Scott Williams
Organization:

Thank you, Kelly. We look forward to the ROD on the preferred alternative "Juneau Creek" soon.

Scott Williams
Sent from my iPhone

RESPONSE: Comment noted.

ID: 1340 **Source:** Web **Date Submitted:** 3/13/2018
Name: Bill Tappan
Organization:

I am personally very pleased to see the federal and state highway agencies have decided to listen to those most affected by this project; those of us here on the Kenai Peninsula.

Your decision to now go with the Juneau Creek Alternative demonstrates your willingness to listen to public comments and see the sound reasoning behind selecting this alignment.

Keeping traffic, especially commercial traffic, away from the river should help protect the resource from future spills of fuel into the river.

It is my understanding that the project will cost approximately $54 million less given no new bridge will be part of the project; great idea, saving money.

After 35-years of planning and studies after studies, there may be a light at the end of this tunnel after all. So, when will you start/complete construction?

Congratulations.
Bill Tappan

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm. Construction is anticipated to occur in 2020–2025 depending on available funding.

ID: 1342 **Source:** Web **Date Submitted:** 3/15/2018
Name: Michael Velikanje
Organization:

It's about time...it was need 20 years ago. This project was being discussed when I lived in Moose Pass Ak between 1985 and 1994 and it wasn't a new discussion then.

RESPONSE: Comment noted.

ID: 1343 **Source:** Web **Date Submitted:** 3/15/2018
Name: Tom McReynolds
Organization:

The best choice so far on this one! Looking forward to it starting!

RESPONSE: Comment noted.

ID: 1346 **Source:** Email **Date Submitted:** 3/16/2018
Name: Steve Foster
Organization:

Mr. Brian Elliott,

I just wanted to voice my support for the decision to choose the Juneau Creek Alternative route for this project. I was born on the Kenai Peninsula in 1957 and I am looking forward to a safer route through the Cooper Landing area.

Thank you,
Steve Foster

RESPONSE: Comment noted.

ID: 1347 **Source:** Web **Date Submitted:** 3/16/2018
Name: Gerry Guay
Organization:

I like the route, as it should reduce congestion along the river, significantly removing truck traffic and give the public wishing to move quickly between Anchorage and Soldotna a better option. This also should improve the River experience for those wanting to fish, but will also turn Coopers Landing into a ghost town.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS in describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

What is planned for road development across the avalance chute around mile 46? In the wake of the tragic accident in Miami, can we put in a long bridge which will be safe? How willl the improved traffic flow impact the intersection with the Seward Highway on high use weekends?

RESPONSE: The issue of avalanches has been considered in the Final EIS. The road is proposed on the same alignment across the avalanche chute you cite. During the design phase of the project, DOT&PF will examine the avalanche chute and consider if additional design changes are warranted.

The bridge across the Juneau Creek Canyon will be designed to meet current design standards. Structural and geotechnical engineers have considered the proposed location and believe that several bridge types will be technically feasible for that location. For more information, see the *Preliminary Bridge Structures Technical Report*, available on the project web site at:
http://sterlinghighway.net/Documents/Preliminary%20Bridge%20Structures%20Tech%20REPORT%20(Final%209-8-11).pdf

Traffic at the junction of the Seward and Sterling Highways will be unchanged as a result of this project.

ID: 1349 **Source:** Web **Date Submitted:** 3/16/2018
Name: Carol Griswold
Organization:

I realize that this is a tough problem and there are no perfect solutions. I am glad to see the highway moved away from the Kenai River as much as possible.

I do wonder about the steep grade noted for much of the road. Will this pose difficulties for vehicles, especially semi-trucks and possibly lead to more accidents?

RESPONSE: The grade of the road has been designed to be within acceptable limits for a Principal Rural Arterial that is part of the National Highway System (NHS). Crash analysis done for the project (Appendix A, *Crash Analysis*, of the Final EIS) shows a substantial improvement for the Juneau Creek Alternative as compared to the No Build Alternative.

Will large mammals use the overpass? Will there be fencing to force use of either the overpass or underpass? Otherwise, why would mammals choose to use them over just crossing the highway?

RESPONSE: The wildlife crossings are proposed to be in locations where project biologists anticipate large mammals will use them. During design, fencing, vegetation, and other features will be used to encourage wildlife to access the crossings and to make them as useful as practical.

Is a standard two-lane highway adequate for this high-use highway? Would it be possible to provide a three-lane highway especially where the highway is close to the river from MP 55 to 58? Or even better, for the whole project? I think that would be much safer, and built for the future.

RESPONSE: The numbers of lanes have been engineered to meet the forecast of future travel. Three-lane sections are used to provide passing opportunities. Three-lane sections would also occur in areas where turn pockets are proposed. This will help improve safety by giving people safe places to pass and getting turning vehicles out of the travel lane to make their turn.

Will there be parking and turn lanes for any or all of the trails accessed by the highway? I appreciate any feedback on my questions.

RESPONSE: Turn lanes will be provided at trailheads accessed by the project.

Thank you!
Carol

ID: 1350 **Source:** Web **Date Submitted:** 3/16/2018
Name: Wallace Thomas
Organization:

I am in full support of the alternative chosen. This route provides the most protection for the Kenai River. That is the most important consideration -- to protect the water of this world class river. All the routes involve trade-offs and this route -- Juneau Creek Alternative is the best trade-off. I am a Resurrection Pass trail user too. I feel an overpass is acceptable and will not degrade the trail experience in any significant way. Please support and select the Juneau Creek Alternative.
Thank you

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1351 **Source:** Web **Date Submitted:** 3/17/2018
Name: Lisa Turner
Organization:

I find it deeply concerning that we are building new roads when we cannot maintain and plow the roads we currently have. This is an elective road project, and maintaining the existing roadways is essential to

life, business, and community.

The State's current financial situation, and dire economic forecast should limit any expenditures on new road projects.

RESPONSE: The programming of projects, including this one, goes through a rigorous statewide evaluation and ranking process, which is ultimately approved by the DOT&PF Commissioner and FHWA. This project will be funded by approximately 90 percent federal funds and will be phased in over time. The *Initial Financial Plan* (Appendix H of the Final EIS) provides additional details on how the project is proposed to be funded.

ID: 1352 **Source:** Web **Date Submitted:** 3/17/2018
Name: Paul Turner PhD
Organization:

I do not support the Juneau Creek Alternative.

It is Orwellian to suggest that a land exchange mitigates the loss of backcountry wilderness for the Resurrection Pass, Juneau Falls, and Bean Creek wilderness areas.

This plan maintains that wilderness loss in the EIS is not expected to occur because of a land exchange. A land exchange does not mitigate the loss of wilderness. Juneau Falls will be lost as part of this frequently used backcountry wilderness hiking system. This alternative severely and adversely affects the longest and most used long backcountry wilderness backpacking/hiking trail on the Kenai Peninsula cutting off a significant percentage of the trail from wilderness use.

RESPONSE: The land exchange is not proposed as “mitigation” for the loss of backcountry wilderness. The impacts of lost wilderness land and backcountry experiences, including the impacts to Wilderness and crossing of the Resurrection Pass trail you mention, are fully disclosed in the EIS. Mitigation for the crossing of the trail is included in the EIS (a new trailhead and parking area, connecting trails, and new trail connections on the Snow River Bridge on the Iditarod National Trail). To clarify, the Resurrection Pass trail through the project area is not within designated Wilderness and the Juneau Creek Alternative does not “cut off a significant percentage of the trail from wilderness use.” The trail will remain continuous, and impacts to the trail are not considered “wilderness” impacts.

The loss of the Bean Creek trail is significant with the corresponding loss of recreational trails.

RESPONSE: The Bean Creek Trail will not be “lost.” The impacts to the trail are described in the EIS, and mitigation for the trail is included as part of the project. The trail will remain continuous. The changes to the character of the trail are described in Chapter 4 of the Final EIS.

This alternative incorrectly destroys unique wildlife habitat. Transportation biologists and planners lack wildlife crossing structure research. This alternative increases adverse and deleterious risks to all wildlife to a degree that is unacceptable. Wildlife cross structures and overpass has negative data supporting their use. Few studies have examined their effectiveness beyond simply documenting animal movements (Saway et al. 2014). Hiijser et al. (2016) found large mammal use of underpasses is highly variable. Sawaya et al. (2014) found wildlife crossings have little support for providing genetic connectivity to

wildlife separated and fragmented by roads. Shepard et al (2008) found roads act as barriers to animal movement through direct mortality. This alternative reduces access to habitat and mates (Forman et. al. 2003). Moose mortality on the Kenai Peninsula has resulted in a marked reduction in the population. While overpasses and underpasses are laudable, this alternative will attract moose to the planted grass on the sides of the longest alternative and increase mortality. Further the state makes little effort to keep browse down by mowing at the end of summer and do not have wide cleared right of ways to give vehicles a sight line to avoid moose. The Juneau Creek alternative will increase moose and very likely other animal mortality. Unequivocally, this alternative will increase moose road kill.

RESPONSE: The Final EIS fully documents and discloses the potential wildlife habitat impacts and proposes mitigation. The proposed mitigation is based on extensive wildlife crossing research, including modeling to identify likely wildlife use corridors that have been validated with a year's worth of field camera tracking data to identify the locations most conducive to providing effective crossings.

This alternative is not viable because of the large amount wetlands that will be lost having an adverse effect on the ecology and water flow.

RESPONSE: DOT&PF and FHWA have fully disclosed the wetland impacts associated with the Juneau Creek Alternative. The project's development included field mapping and verification of wetlands and their functions within the project area, documented in special studies supporting the analysis. The Juneau Creek Alternative would include more fill in wetlands but would move traffic away from the Kenai River over the longest distance. Both the wetlands and the river are considered "waters of the United States" under jurisdiction of the Clean Water Act. FHWA's determination is that moving the highway farther away from the Kenai River by selecting the Juneau Creek Alternative will result in less harm overall and be less environmentally damaging, despite the higher amount of fill in wetlands. Additionally, the Final EIS (Appendix G) includes a draft Clean Water Act 404(b)(1) analysis, documenting the wetland impacts and proposing mitigation. DOT&PF is in the process of conducting wetland permitting with the U.S. Army Corps of Engineers and will further refine wetland mitigation as part of that permitting process. That mitigation will either include fee-in-lieu or permittee responsible mitigation to mitigate for the wetland impacts associated with the project.

Climate change may be particularly harmful for this alternative as animals will be in fragmented populations, and the road will negatively affect the evolutionary opportunities to adapt to evidenced based changing environmental conditions.

RESPONSE: Climate change impacts are identified and discussed in Section 3.27 or the Final EIS.

Last, businesses will suffer with this alternative.

RESPONSE: Business impacts are discussed in Section 3.5 of the Final EIS.

ID: 1354 **Source:** Web **Date Submitted:** 3/18/2018
Name: Bill Turner
Organization:

I oppose the proposed route because;
-Takes away from the premier backcountry wilderness Resurrection Hiking system.
-Eliminates Juneau Falls backcountry wilderness use.

-Eliminates Bean Creek backcountry wilderness use.
-Destroys wildlife habitat.
-Removes much needed wetlands.
-Increases wildlife mortality.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1365 **Source:** Web **Date Submitted:** 3/20/2018
Name: Dennis Linnell
Organization:

Finally!! I like the preferred alternative. Let's hope the final design doesn't get bogged down and we can see this project constructed in the next 10 years.

RESPONSE: Comment noted.

ID: 1380 **Source:** Web **Date Submitted:** 3/25/2018
Name: Dona Holliman
Organization:

very much in favor hope it gets done soon
the highway through cooper landing is a nightmare

RESPONSE: Comment noted.

ID: 1381 **Source:** Web **Date Submitted:** 3/26/2018
Name: David Stephens
Organization:

I am writing in support of the recommended alternative. Mostly, because I want high speed traffic directed away from the Kenai River. It will also move through traffic away from Cooper Landing, which will make it a more pleasant place. Enhancing, not taking away, from its commercial potential. Thank you.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1382 **Source:** Web **Date Submitted:** 3/27/2018
Name: Peter McKay
Organization:

Please see the attached document. Sterling_Highway_MP45-60_Comments_Final_EIS_McKay.docx

Attached text follows:

To: Brian Elliott
Sterling Highway MP 45-60 Project
DOT&PF Central Region Environmental Manager

From: Peter E McKay
55441 Chinook Rd
Kenai, AK 99611

Brian,

Thank you for soliciting input for the Sterling Highway MP 45-60 Project.

I have reviewed the EIS. I appreciate the level of detail presented and the quality of the document. It reflects a lot of work.

I was very happy to note that the EIS includes Appendix J – Comments and Responses. It is very nice to see the Project response to the issues raised at the Draft SEIS stage. This does make me (and other people who have commented and read the Project reply comments) feel as if my/our input has value and has been heard.

In particular the response discussion to Comment 537 does make me re-consider my blanket opposition to re-route options on the North side of the Kenai River. I could almost support a G South Alternative based on the sound studies that you provided in Appendix D.

I would like to raise a couple of issues/objections to the Appendix D Noise Report.

1. The Noise Report appears to apply only to human hearing. I think the Noise Report should include the impact that road noise will have on wildlife. It is important to consider the encroachment of highway noise into the important wildlife habitat of the Upper and Lower Juneau Creek areas. Chapter 3.22 discussed the road's impact on various species of wildlife. It does include highway mortality but does not discuss noise avoidance or other noise induced behaviour changes that the Juneau Creek Alternative would cause to their habitat.

RESPONSE: The noise model developed for the FHWA noise analysis is geared toward noise impacts to humans. However, based on the anticipated noise increases from the modeling, project biologists disclosed the anticipated consequences to wildlife. The Final EIS discusses noise related impacts to wildlife in Sections 3.15.1.5 and 3.22.

2. The other objection is that I would consider the “back country” to be Federal Highway Administration (FHWA) Noise Abatement Criteria (NAC) Class A (as described in Appendix D, Table 2-2: FHWA Noise Abatement Criteria). For me - when I travel up the Resurrection trail and turn the corner at the Juneau Creek canyon and turn north away from the last lingering highway noises – this is where the wilderness begins. Myself and many other visitors are up there seeking a tranquil experience. These are “Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose”. This area clearly meets the definition of land use Activity Category A. The current Juneau Falls viewing area is currently quiet and peaceful. If the Sterling Highway traffic is routed north using either Juneau Creek Alternative – the Juneau Falls viewing area will be impacted by road noise. This loss of “Lands on which serenity and quiet are of extraordinary significance and serves an important public need…” would constitute adverse impacts to the trail experience, be unacceptable and must be avoided.

RESPONSE: Based on comments received on the Draft EIS, DOT&PF and FHWA did add additional receptors to the noise model and disclosed noise impacts associated with the Resurrection Pass Trail crossing (See Section 4.5.4.2).

It appears that Department of the Interior has committed to undertake a land exchange that will change the Kenai National Wildlife Refuge and Wilderness boundary. This change of ownership will cause the Juneau Creek Alternative score/rating to be revised because the route would no longer use “Wilderness land” and would reduce the use of “refuge land”. The ownership change in this land exchange will not actually reduce wetlands impacts, reduce wildlife habitat impacts or reduce the impact on visitors on the Resurrection Pass Trail. This land exchange is merely a bit of administrative sleight-of-hand that will cause the EIS calculation/assessment of the alternatives to (unfairly) favour the Juneau Creek Alternatives. I recommend that this land exchange score for the two Juneau Creek Alternatives be factored out of the FHWA decision (Least Overall Harm Analysis under section 4(f)).

RESPONSE: FHWA must consider all reasonably foreseeable future actions (such as the land exchange) in assessing the effects of their proposed action. The comment is accurate in that the change in land status will not reduce impacts to some natural resources and to visitors of the Resurrection Pass Trail. These impacts were fully disclosed and discussed in the Final EIS. See Section 3.20 for wetland impacts, Section 3.22 for wildlife impacts, Section 3.27 for land trade related impacts, and Section 4.5.4.2 for impacts to the Resurrection Pass Trail. These impacts, and the cumulative impacts associated with the land exchange, were fully considered in the Least Overall Harm Analysis (see Section 4.8 of the Final SEIS).

The Chapter 2 Alternatives (Page 2.31) indicates uncertainty about the Juneau Creek canyon bridge design (the span, the type of bridge, the setback from the canyon walls and the canyon wall stability). Chapter 3 Affected Environment and Environmental Consequences (Page 3-275) also indicates some concern about the stability of the bridge location for the crossing of the Juneau Creek canyon in the Juneau Creek Alternatives. “While refinement of the bridge design may be necessary, engineers are confident a bridge can be built in this location. In the unlikely event that later field work would determine that the site was not appropriate, a new bridge site would be examined and a revaluation of this Final EIS would be necessary.” In discussion of build alternatives – this is notable because it is the only expression of any uncertainty regarding the engineering and construction of a critically important major structure – the bridge crossing the Juneau Creek canyon in the preferred alternative. I consider it significant that these small measures of uncertainty were included in the Final EIS report. This fact is reason for the Project to complete the geotechnical investigation of this bridge site prior to committing any further resources to this alternative. If the completion of the Juneau Canyon bridge feasibility investigation requires land/road clearing to move heavy equipment (and drills etc.) up to each side of the Juneau Creek

canyon (as described in the tentative construction schedule) then this alternative should be abandoned.

RESPONSE: A level of engineering sufficient to determine that the Juneau Creek Alternative is technically feasible has been undertaken, including a field investigation by geotechnical engineers. The crossing location for the Juneau Creek Bridge was moved from lower down the canyon (due to engineering concerns at that location) to the currently proposed location, precisely because it was deemed a technically feasible location. Because engineers were confident the bridge can be built at this location, further investigation was not warranted at this stage. Additional engineering investigation will occur during final design.

In summary I oppose the choice of the Juneau Creek Alternatives because of the impact to wildlife in the Juneau Creek drainage. I also favor protection of the entire Resurrection Pass Trail. I do not want to see this popular trail fragmented.

In the Executive Summary of why the Juneau Creek Alternative is preferred - Page 12 states that the Juneau Creek Alternative "has the greatest use of and fill in area wetlands, substantial impact on wildlife habitat, and impacts the Resurrection Pass National Recreation Trail." This is the preferred alternative? I don't think so. I respectfully disagree. I think the Juneau Creek alternatives are two of the worst choices that could be made.

I do not favour the Option G South Alternative for many of the same reasons. This option moves road noise about 6/10 of a mile closer to the Resurrection Pass Trail in the area of Juneau Creek and Juneau Falls. This option also encroaches on the lower Juneau Creek drainage which the report identifies as critical habitat for many wild mammal populations especially bears and moose.

The three northern options (2 Juneau Creek and G South) all have extensive highway lengths built on new alignments that result in larger areas of new effects to habitat. These "permanent" effects cannot be effectively mitigated.

I support the Cooper Creek Alternative. In my opinion this option does the least harm to wildlife habitat. While this Option was marked negatively because it requires (two) bridges over the Kenai River – I look upon this as a positive. There is significant benefit to replacing the aging and deteriorating bridge at MP

47.7 (at the junction of Kenai Lake and the Kenai River). This structure will need to be replaced soon anyways. This Option impacts the Cooper Creek trail – but this impact is fairly close to the trail head and the loss of trail will be minor. The large bridge at Cooper Creek is not as technically challenging and will not have the environmental impact of the Juneau Creek canyon bridge. The Cooper Creek Alternative does significantly improve the vehicle congestion around Cooper Landing while preserving a lot of the river side business access and scenic charm.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose those impacts in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1383 **Source:** Email **Date Submitted:** 3/27/2018
Name: Dennis Randa
Organization:

here's a comment for the hopper. I've no disillusion that it may be embraced by what seems to be fools engaged with fools to find the most acceptable way to deal with human centric selfish interests.

I would ask that the decision be made with prime consideration for the wildlife and habitat of the Kenai River corridor and not the aforementioned. again, I've no disillusion.

I have heard of objection to the Juneau Ck alternative route because of steep slopes and potential for avoidance of those by trucks thus sustaining the present potential for toxic spills into the Kenai River. but that said, what are the alternatives? what I am aware of as the previous preference (south bench) included several bridges across the river. seems there is not one that pleases all for sure (or anyone?).

I am concerned as anyone about the introduction of toxics into the river, and probably more than many.

my support for the Juneau Ck alternative has most to do with returning the river course to it's original tenants, most of whom have been displaced. specifically I refer to bears that have been shoved onto the Juneau Ck alternative bench for safe passage thru the area instead of using the river's course which is where they, at least in my mind, would chose given choice. presently they are subject to a lot of harassing interference from human traffic, highway, fishing, etc.. and it's not like much of that would change even if the highway were to be moved anywhere other than where it is now. the solution for my concerns as well as what others concerns appear here to me would include what is a 'no brainer' for me (obviously many think I've no brain for suggesting it).

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose those impacts in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

what I have tried to get included into the package (concept) is a barrier at the Schooner Bend bridge (openable on emergency); this barrier would prevent thru traffic on the existing highway returning the river's course to as close to pre-highway condition as possible and yet allow public safety, ambulance, fire, etc., to use the 'old' route when necessary. cut down on traffic. make it a dead end for public from each way. save a few bears and make the ambience of that part of the river so much more than it is now.

RESPONSE: The idea of limiting traffic on the old highway from crossing the Schooner Bend Bridge was discussed early during alternatives development and screening. However, the connection is important for local circulation, with important destinations on both sides.

regards the steepness of the Juneau Ck alternative, we have in many places made such passage achievable for railroad traffic, perhaps something of that nature would solve those concerns. actually, what I'd prefer is a railroad along side the highway allowing rail traffic to the peninsula. as I hurt myself laughing.

RESPONSE: Railroads are actually more grade-limited than roads. In evaluating the purpose and need for the project, the kinds of problems encountered on this stretch of highway could not be resolved using a railroad.

put a locked gate on the bridge. give access only to public safety. nobody else uses the river highway corridor for thru traffic. ah, what a perfect world I could make given the power……..

RESPONSE: Again, because the old highway remains critical for local circulation, gating or closing the Schooner Bend Bridge is not reasonable as mitigation.

Dennis Randa
P.O. Box 3055
Soldotna, AK 99669
denrand@randafishing.com

ID: 1384 **Source:** Web **Date Submitted:** 3/27/2018
Name: Jerry Bixby
Organization:

Proposed route makes most sense as it eliminates another bridge over the Kenai. Juneau Creek route is the best route available and I 100% support it.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1385 **Source:** Web **Date Submitted:** 3/27/2018
Name: Judy Gilliland
Organization:

We use the walkway from Sunrise into town year round and it would really hurt our community and many of our businesses to not have that access. Part of the trail is the bottom 3rd of my driveway which I believe is to be taken for widening the road. I have an Airbnb and my guests use the trail to get to the lake and into town, and we use it to get to Quartz Creek and to Sunrise.

We do need to make sure we still have someplace to park for several nights when using the Resurrection trail because that is a through hike with many cabins so people can stay overnight.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted with the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where

possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

ID: 1386 **Source:** Web **Date Submitted:** 3/28/2018
Name: Mary Vavrik
Organization:

I am writing to express my disappointment that the Juneau Creek alternative was selected for the Sterling Highway MP 45-60 Project. This alternative is more costly and environmentally damaging than the Cooper Creek alternative. It will destroy the pristine qualities of the southern end of the Resurrection Pass Trail and will involving building another bridge across the Kenai River, which will impact the large salmon run on the river. The Cooper Creek alternative would use portions of already existing roadway and would negate the need to build another bridge across the river.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. As a point of clarification, the Juneau Creek Alternative is not more costly than the Cooper Creek Alternative, and does not involve building a bridge across the Kenai River. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. The Cooper Creek would have greater community impacts from noise and property acquisition, and would have greater impacts on the Kenai River. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1387 **Source:** Web **Date Submitted:** 3/28/2018
Name: Phillip Miller
Organization:

Unintended impact from material source and disposal sites.

Please consider significant physical obstacles and re vegetation to all materials source and disposal sites to reduce the future possibility of rambo rest stops, unauthorized debris disposal, and uncontrolled freelance camping. These types of activates in former material source and disposal sites in the past presented safety hazardous from uncontrolled fire arms, fires and unauthorized disposal and a litany of other negative environmental impacts over time.

RESPONSE: DOT&PF has agreed to complete a vegetation plan during final design and will be working with land managers to appropriately revegetate and restore impacted areas. The goal of revegetating waste disposal sites will be to return them to a natural state. Using design features, such as boulders or vegetation, DOT&PF will not allow unauthorized access to the restored areas, ensuring they do not become de facto rest stops or camp sites.

Please consider maintaining the continuity of the trail that is along the existing highway and Old Sterling highway between mile 45 and mile 47. If reasonable economically possible please improve the small

areas that are very close to the highway at mile 45.5-8 and 47.1.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

Thank you for your efforts, Phillip

ID: 1388 **Source:** Web **Date Submitted:** 3/29/2018
Name: Judy Gilliland
Organization:

I suggest moving the road a little south of my property so the walking trail can still be used to get to Sunrise and biking to Cresent Lake trail. It looks like the current plans are to use a slice across the southern part of my property and that would wipe out the walking trail that is used year round by residents and in the summer by so many others.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

ID: 1389 **Source:** Web **Date Submitted:** 3/29/2018
Name: David Vought
Organization:

I strongly support the Juneau Creek route because it is the best option to get the road out of the river corridor.

I am concerned about the limited off road parking. I anticipate people will be parking on the shoulder to access desirable off road areas such as the Slaughter Creek trail and the Fuller Lake Trail. Since I have not been on the new road alignment I do not know if there are other access points that should be considered. I recommend the agencies consider likely access points along the new route. I appreciate the need to minimize stopping along the new highway but it is better to anticipate what people will do for access and design the road accordingly instead of people parking on the shoulder and creating a hazard.

RESPONSE: DOT&PF and FHWA worked with adjacent land managers and have agreed to provide pull-out parking where those managers need/desire it to support their land management objectives. The EIS recognizes people may park in some popular locations on the shoulder when parking lots are full. However, DOT&PF will be signing such locations for "no parking," and it is anticipated law enforcement would enforce parking restrictions.

Finally I would like to see the new road constructed ASAP as the current route through Cooper Landing is terrible. I drive that route many times every year.

RESPONSE: Construction on some phases of the project could begin as early as 2020.

Thanks

ID: 1390 **Source:** Web **Date Submitted:** 3/30/2018
Name: James Dickson
Organization:

I support the choice of the Juneau Creek Alternative. Juneau Creek Alternative will relieve the traffic and safety issues in Cooper Landing; and create a safe and direct route to the Seldotna, Kenai, and the South Peninsula. Moving traffic farther away for the river will offer more protection that fragile resource.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1391 **Source:** Email **Date Submitted:** 3/30/2018
Name: Richard and Cassandra Winslow
Organization:

Executive Summary

Significant issues with the EIS should be addressed before the final EIS is issued as a record of decision. In summary, the EIS does not adequately address the following areas; Travel Patterns (3.6) and Environmental Consequences, Risk of Spills (3.17). In its present form, the EIS overstates the benefits of the project and understates the risks. The Juneau Creek alternative opens up significant terrain to new environmental exposure while marginally reducing risk along the Kenai River. The EIS does not address the overall relative risk structure, environmental consequences and resultant tradeoffs associated with the alternative route vs the current route. Additionally, the EIS does not discuss (cost / benefits / remaining

risk) performing a partial improvement analysis of the existing route vs the extensive environmental disruption created by the alternative route.

Response: The EIS does evaluate an alternative, the 3R Alternative, that considers a "partial improvement analysis of the existing route." It was studied in both the Draft EIS, and additional analysis was conducted for the Final EIS (see Chapter 2). This alternative was considered but rejected because it did not satisfy the purpose and need of the project and was not technically feasible from an engineering perspective.

The following specific comments are provided for the FEIS Review / Public comment period.

A) Comments on: 3.6.2.2 Issues Applicable to the Build Alternatives - Travel Patterns

Hazardous Material Transporters present the single biggest environmental risk to the Kenai River. The EIS does not reference any surveys of commercial drivers with respect to route choice during the winter months. Local residents and former commercial drivers believe that there is a very high likelihood that hazardous material transporters and other large commercial traffic will utilize the old highway over the Juneau Creek Alternative Route during the winter months (October - March) for the following reasons:

- The Juneau Creek Alternative Route will feature multiple hilly / steep grades the will receive more exposure to ice and snow. Steep, icy grades with very large commercial traffic is avoided to reduce risk exposure.
- The old highway automobile traffic load will be less due to the alternative routing and winter months. This will make negotiating the old highway easier for commercial traffic.
- A summary discussion with local residents and former commercial drivers indicates that the old highway will receive significant commercial traffic during winter months.
- Data compiled by the Sterling Highway, Alaska, Origin-Destination Study may be misleading as it may not accurately represent large commercial operators.
- The EIS should survey commercial operators and properly factor this into the EIS and commensurate risk studies.

A section of 3.6.2.2 as presently written in the EIS provided for reference:

3.6.2.2 Issues Applicable to the Build Alternatives - Travel Patterns

Through traffic that is larger vehicles, including commercial trucks, vehicles towing trailers, and RVs, is anticipated to use the new highway for the reasons stated above and for several other reasons: (a) to avoid the need to stop and turn twice to get off the main highway and then back on, and the need to accelerate a cumbersome vehicle back to cruising speed, (b) to avoid the narrow roadway, where it is easy to drop the back wheel of a long vehicle off the pavement1 or to scrape a trailer on the numerous guardrails2 and where maneuvering a large vehicle against oncoming traffic leaves little room for error, and (c) to avoid the need to change speed or stop multiple times for other drivers who may be looking for a destination, waiting for a gap in oncoming traffic to turn off the road, turning onto the road and needing to get up to speed, or just taking in the view. In winter, when traffic is lighter and road conditions sometimes worse, drivers of larger vehicles may occasionally elect to use the "old" route to avoid fresh snow or freezing conditions at the higher elevations of the segments built on a new alignment. This is expected to be rare, particularly because the main highway is expected to have higher priority for road maintenance such as snow clearing and sanding.

RESPONSE: The EIS discloses the potential impacts discussed by the comment, as evidenced by the quoted material by the commenter. The EIS recognizes that during some winter conditions, commercial operators may choose to use the old highway. In such cases, the risk of spills is no greater than would be experienced under the no build condition. However, under most operating conditions, trucks will use the Juneau Creek Alternative, resulting in a substantial reduction in spill risk to the Kenai River.

Because of similar questions expressed during the review of the Draft EIS, DOT&PF conducted additional analysis. For the Final EIS, a new crash analysis was added to Appendix A. That analysis predicts a 69.7 percent reduction in crashes if the Juneau Creek Alternative is built, compared to the No Build Alternative. Truck crashes were also estimated for the design year (2043) with 2.8 crashes predicted for the No Build Alternative and only 1.1 estimated for the Juneau Creek Alternative in 2043. Other data was also added to the Final EIS to disclose the potential impacts of spill risk into the Kenai River. Section 3.17 documents spill risk and discloses the time it would take for spills to reach the Kenai River. Because more of its alignment is farther from the river, spills that would occur along the Juneau Creek Alternative alignment take longer for the material to reach the Kenai River (See Map 3.17-2).

Data compiled for the Origin-Destination study covered all vehicles, including commercial truck operators. It is statistically valid and is more accurate than anecdotal conversations. Additional survey of commercial operators is not warranted given the already documented information on travel patterns and spill risk.

B) Comments on: 3.17.2.5 Environmental Consequences; Risk of Spills

The risk of spill has been incorrectly categorized and calculated. The following errors are present in this area of the EIS:

1. Commercial Truck Traffic Routing Considerations. Commercial truck traffic representing the highest risk of hazardous material spill are assumed to exclusively utilize the Juneau Creek Alternative. This is an incorrect assumption. The Juneau Creek Alternative rises to an elevation of 1060' above MSL (Mean Sea Level) with multiple lengthy 6% grades. Commercial trucks will opt to utilize the old highway during winter months (October thru March) to avoid the risk of long icy grades that will be present on the Juneau Alternative. As such, the risk reduction represented by the Juneau Creek Alternative due to re-routing of traffic can only be assumed to be 50% from current risk levels. The EIS needs to address this dual season routing and the impact of calculated risk levels. The Executive Summary should address these changes.

RESPONSE: The comment is incorrect. The crash analysis completed for the project does not assume that commercial truck traffic would exclusively use the Juneau Creek Alternative. The analysis assumes that 70 percent of traffic would use the new alignment and 30 percent of the traffic would use the old highway. As described in the EIS, this likely overestimates the truck traffic using the old highway because commercial truck traffic has a greater percentage of through-traffic movements than the general traffic mix. The crash analysis includes/discloses crash data for both the new and old highway alignments. Again, the analysis does not presume that all commercial truck traffic will use the new alignment, and to assume that all truck traffic will use the old alignment for 6 months of the year is not realistic.

2. Steep Grades on the Juneau Creek Alternative and Commensurate Loss of Containment Risk. The Juneau Creek Alternative features multiple steep grades. No truck run away ramps are planned in the design. A hazardous material transporter that loses speed control on the steep grades will be much more likely to overturn and or leave the roadway in an uncontrolled manner at a high rate of speed.

This will significantly increase the risk of tanker hull breach / loss of chemical container integrity. (In contrast, the relatively slow speeds of the current route configuration aid in the prevention of tanker hull breach / loss of chemical containment.) The reduction of risk described in 3.17.2.5 is therefore further negated and needs to be addressed. The EIS should address this discrepancy and assign a risk factor associated with these steep grades / lack of truck runaways.

RESPONSE: DOT&PF has considered the need for truck escape ramps. DOT&PF follows required American Association of State Highway and Transportation Officials (AASHTO) standards, and this project does not meet the criteria for this feature. Truck escape ramps are not warranted. Grades on the proposed alignment are within acceptable standards for a NHS facility. The grades and length of the climb and design criteria are similar to other grades on the Seward Highway, and commercial operators navigate those grades without the need for truck escape ramps. Moreover, coming out of the downgrades, the alignment has few curves to navigate, which is also a consideration in determining the location where truck escape ramps are warranted.

3. Spill Location and Probability of Containment. A spill located along the Juneau Creek Alternative will be difficult to control once it travels beyond the 30' clear zone due to the more rugged, steep, and isolated terrain along this route. Responding to a spill on the Juneau Alternative will take significantly longer for Cooper Landing Emergency Services. As noted in Section 3.17, Cooper Landing Emergency Services has limited containment and absorbents and mutual aid from Kenai or Anchorage has been noted to require 3-4 hours. Due to the location of this alternative route, the probability of significant environmental exposure is higher, including the migration of the chemical into a wetlands or hydrographic source connected to the Kenai River. The EIS should calculate the worse case scenario (8,000 gallon spill of diesel into Juneau Creek?) spill extent with only Cooper Landing Emergency Service resources available for the first 4 hours and delayed response time due to the increased distance from the Cooper Landing Fire Station. While the current route is inherently risky due to river proximity, the ability to quickly set up containment and more easily bring community resources to bear may show the the risk reduction assumed on the Juneau Creek route is significantly less than assumed.

RESPONSE: The EIS discusses and discloses the risk of spills and the time that may be provided to clean up the spills. The analysis is not assumed, but has been measured using Geographic Information System (GIS) analysis and hydrologic analysis of stream flows. The Juneau Creek Alternative alignment would provide substantially more time to respond to a spill as compared to the No Build Alternative and the other build alternatives (see Map 3.17-2). In addition, it has less chance that the spill will occur into Tier 1 streams (see analysis in Section 3.17) with only 16 percent of its alignment being within 300 feet of a Tier 1 stream as compared to 33 percent for the G South Alternative, 43 percent for the Cooper Creek Alternative, and 56 percent for the No Build Alternative.

4. Risk of Spills Lowered? Since 1995, two major liquid spills have been reported between MM 45-60. As shown in 1 above, the expected re-routing of commercial traffic to the Juneau Creek Alternative can realistically be assumed as 50%, not 100%. Based on the statistical history from 1995-2017, the expected major spill rate will be one spill on the old highway for the first 22 years after the Juneau Creek Alternative is completed. The EIS should explain why a $280 Million project will still result in one major spill along the Kenai.

RESPONSE: The purpose of the project is not to eliminate the risk of spills into the Kenai River. The purpose and need for the project is to reduce congestion, bring the highway up to current standards, and improve safety. Compared to the other build alternatives, the Juneau Creek Alternative performs the best

on measurable purpose and need criteria. The data bear out that the Juneau Creek alignment will substantially reduce the risk of crashes, including truck crashes; has considerably less of its alignment in proximity to the Kenai River and other Tier 1 streams (reducing the potential that should a spill occur it would reach the steam or river system); and allows more time to respond, compared to other alternatives, should a spill reach a stream.

5. Additional environmental exposure. The Juneau Creek alternative opens up significant terrain to new environmental exposure while marginally reducing risk along the Kenai River. The EIS does not address the overall relative risk structure and tradeoffs associated with the alternative route.

Section 3.17.2.5, as presently written in the EIS provided for reference:

3.17.2.5 Juneau Creek and Juneau Creek Variant Alternatives Direct and Indirect Impacts

Hazardous Waste Sites. The direct and indirect impacts from hazardous waste sites are the same as those discussed in Section 3.17.2.2.

The primary reduction in spill risk would come from the reduction in crash risk.
The risk of crashes would be reduced substantially compared to the No Build Alternative; see Section 3.6.
The risk of any spill that did occur reaching water or the Kenai River would depend on many variables, as described in 3.17.2.2.

It would create a new bridge over the Kenai River, and 70 percent of area traffic would be expected to cross that bridge. The existing Cooper Landing Bridge would see a reduction in traffic (30 percent of total traffic would use that bridge), but the alternative would create a new crossing of the river.

Risk of Spills.

The Juneau Creek Alternative approximately 26 percent within 500 feet of Tier I streams, 16 percent would be within 300 feet. The Juneau Creek Variant Alternative 25 percent within 500 feet, and 16 percent of the total would be within 300 feet of the Tier I water bodies. Both of these alternatives have moderate exposure to steep side slopes and high exposure to wetlands. However, these alternatives provide separation from the Kenai River and other Tier I streams over the longest distance, likely providing responders more time to protect the Kenai River in the event of a spill in these separated locations. See Map 3.17-2. The western segments of these alternatives built on the existing alignment would remain relatively near the Kenai River, posing greater risk than the segment built on a new alignment. However, the highway would be reconstructed throughout to meet current standards and improve safety, so the risk of crashes would be much lower than the existing highway.

RESPONSE: The analysis (as cited by the commenter) documents that the EIS discloses the impacts associated with the Juneau Creek Alternative and its potential effects regarding spills from opening up new terrain. Of note, the commenter appears to have cited materials from each of the build alternatives, not just the Juneau Creek discussion. The DOT&PF and FHWA dispute the assertion that the Juneau Creek Alternative only “marginally” reduces the risk along the Kenai River. Data in the Final EIS and summarized in the responses above demonstrates substantial benefits to reducing crash risk and the environmental exposure to Tier 1 streams and the Kenai River.

C) Miscellaneous Comments

1. MM 56-57. MM 56 through 57 is a noted brown bear viewing area. Despite the current lack of shoulders and narrow lane width, drivers are not hesitant to park alongside the road and watch the bears in the Kenai River. Additional shoulder pull off area should be considered for this stretch of road. With an improved road structure, shoulders, and cleared area, drivers will be less cautious and prone to travel at a higher speed. Coincidentally, 'bear gawkers' will note the wider shoulders, etc. and immediately develop a parking lot at 55 mph. Improving the road in this area without adding additional pull off structure will increase the risk of crashes. As all traffic will flow through this area, this will also increase the risk of crashes for large commercial traffic. Since the section of road is directly along the Kenai River, the environmental risk from chemical spills will also increase significantly.
    - The EIS should address this additional environmental risk exposure to the Kenai
    - The EIS should consider the use of some type of passive spill containment / directed run-off alongside this section of road.
    - The EIS should address this additional seasonal crash risk in this location

RESPONSE: There would not be "additional environmental risk" at this location amongst build alternatives. All the build alternatives are the same through the segment mentioned by the commenter, and all would have the same risk. With wider shoulders and improved sight distances, safety will be improved as "gawkers" will have a place to pull out of the travel lane and approaching traffic will have a better chance to see them. Moreover, DOT&PF and FHWA worked with adjacent land managers and have agreed to provide pull-out parking where those managers need/desire it to support their land management objectives. The EIS recognizes people may park in some popular locations on the shoulder, especially when parking lots are full. However, DOT&PF will be signing such locations for "no parking," and it is anticipated law enforcement would enforce parking restrictions.

2. Shoulder Width. Standard design shoulder width has been stated as 8'. The EIS takes credit for reducing the risk of crashes by following these standard designs. However from October through March, snow berms will be present alongside the road and on the shoulders due to snow removal operations, in essence effectively limiting the benefits of the 8' shoulders to 6 months out of the year. In addition, most commercial vehicles are at least 8' wide and many RV's are 8'6" wide. A wider than standard shoulder width will alleviate many of these concerns.
    - The EIS should state that the reduction in crash risk is minimized with 8' wide shoulders during winter months.
    - Design consideration should be given to wider shoulders (where land / geology supports this endeavor).

RESPONSE: The shoulder width is based on national standards that DOT&PF has adopted and uses on Rural Principal Arterials across the state. The standard takes into consideration snow and vehicle mix and has proven to be effective at both the state and local level. The standard balances the safety aspect of providing an effective shoulder with the costs and environmental impacts of providing something wider.

3. Current Route Improvements. What consideration has been given to improving the current route as much as possible? The EIS needs to address improving the current route with the following considerations:
    - Recognize and explicitly state that sections of the current route could not be upgraded to current highway design standards due to geo-technical considerations.
        - Identify the crash risk reduction or remaining inherent crash risk from not fully meeting highway design standards in some sections.
    - Address the ability to design in / incorporate spill control technology as part of the upgrade on the

most vulnerable sections of road

- Recognize that a current route upgrade would prevent the environmental disruption of significant pristine areas as predicated by the proposed Juneau Creek Alternative?
- Address the use of active and passive crash (environmental risk) mitigation strategies that could be incorporated into a current route improvement design.
    - Continuous active speed enforcement (photo radar, etc.)
    - Turning lanes
    - Extended shoulder widths where possible
    - Extended lane widths where possible
    - Curve / LOS (line of sight) corrections where appropriate and possible
    - Active warning technology for tight curve speeds, etc.

Response: The EIS does evaluate an alternative, the 3R Alternative, that considers a "partial improvement analysis of the existing route." It was studied in both the Draft EIS, and additional analysis was conducted for the Final EIS (see Chapter 2). This alternative was considered but not carried forward for full analysis because it did not satisfy the purpose and need of the project and was not technically feasible from an engineering perspective.

Your presentation in Soldotna was very well done. Your effort and patience in this regard is noted and appreciated.

Regards;

Richard Winslow and Cassandra Winslow 907-252-1099

ID: 1392 **Source:** Web **Date Submitted:** 3/31/2018
Name: Janice Troyer
Organization:

I am concerned that the large waste area outlined south of the highway will disrupt the access to the popular Bean Creek Trail. I hope that the intended waste is purely organic and that there will be some effort to re-route Bean Creek trail to the nearby neighborhood.

RESPONSE: As a permanent effect, the disposal site is located west of Bean Creek Trail and would not affect access to the trail. Temporary access by trucks to the disposal site will affect the Bean Creek Trail, and the EIS provides details regarding maintaining trail access during the construction process. Under the Juneau Creek Alternative, there would be no permanent change to trail routes or access near the southern terminus of Bean Creek Trail. Access from the neighborhood on the historic route would be retained, as would access from the east side of Bean Creek off the extension of Slaughter Ridge Road. Farther north, the trail would be formally rerouted to pass beneath Juneau Creek Bridge. The disposal site would be for any unusable soils and organics, including both organic and mineral soils. The EIS explains these issues.

I am also wondering why that area is so far from the actual highway where presumably the material would be coming from. It seems like it would make more sense to have it closer to the highway and potentially not impact the Bean Creek trail, as well as have less impact on nearby residents. The same could be said about the staging area. Why is it so far from the proposed preferred route?

RESPONSE: The location was determined early in preliminary engineering based on suitable topography, avoidance of impacts, and access from the alternative alignments.

If possible, I would suggest moving both the staging and waste areas closer to the highway and away from the Bean Creek trail. (I'm basing these comments on an aerial photo map I saw at the Lousaac library presentation on March 29th.)

RESPONSE: During final design, engineers will examine the area in detail, and it is possible the location could change, In that case, it would be addressed in an environmental re-evaluation document. However, there are other trails east of Bean Creek Trail, there are wetlands, and the ground becomes steeper. It is not clear that a better location could be found. As indicated above, temporary Bean Creek Trail impacts have been mitigated as indicated in the EIS.

ID: 1393 **Source:** Web **Date Submitted:** 4/1/2018
Name: Glynn Macsurak
Organization:

I attended the final EIS presentation in Soldotna this week. Thank you for a great presentation. The Juneau Creek Alternative route is an awesome choice. Looking forward to this project finally getting completed!

RESPONSE: Comment noted.

ID: 1394 **Source:** Web **Date Submitted:** 4/1/2018
Name: Paul Radzinski
Organization:

My wife Laurie and I have been landowners in Cooper Landing since 1992, now full time residents. The Juneau Creek Alternative proposal will go approximately .2 miles behind our property, somewhat negatively impacting our residence with increased noise.

That said, the main reason we choose to live and recreate in the Cooper Landing valley is because of the amazing ecosystem the Kenai River provides. The single greatest threat to this entire ecosystem is the probable event of a major chemical/fuel spill in the river. Given enough time, this is a statistical certainty. We want to preserve this valley for our children, grandchildren and all future generations to enjoy it as we have. Removing large, sometimes tandem trucks from the river is the only way to remove the risk of a catastrophic event.

Additionally, the section of the road from Jim's Landing to Quartz Creek Road is the site of numerous vehicle accidents, sometimes fatal. I can't help but think of the RV accident in the stretch near Quartz Creek Road a few years back where a young girl died when the RV went off the road in a non upgraded section of the road. This would have been prevented with the Juneau Creek Alternative. All other build options, including the "Do Nothing" option will not completely address these two compelling risks,

Even though the new bypass will affect our property, we strongly support the construction of the Juneau Creek Alternative as it is the only option that will completely remove the risk of a catastrophic spill in the

river AND save lives and injuries in a very dangerous section of road. All the negatives associated with this build project are trivial when compared to the greater good this build will provide with safety and conservation. Let's just hope that no spill or lost lives occur before the completion of this excellent project.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

Paul Radzinski

ID: 1400 **Source:** Web **Date Submitted:** 4/3/2018
Name: Larry Engel
Organization:

During the road improvement of Sterling Highway in Cooper Landing I am concerned about the potential loss of the walking trail that is so very important to locals and tourists. I use the trail winter and summer and would not want to see the road expansion eliminate the ability to walk safely between Sunrise and town. While I don't believe the trail needs improvement, it's loss would be a huge negative impact to me and many others. In short, please insure the highway improvement stays south of the current walking trail.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

ID: 1401 **Source:** Web **Date Submitted:** 4/3/2018
Name: John VanderHoff
Organization:

I would first like to thank the agencies involved who provided the information at the meeting in Cooper Landing. I am definitely in favor of the Juneau Creek alternative route and hope that it stays as far north of the existing highway all the way to the Skilak turnoff.

I read in the Peninsula Clarion concerns that heavy traffic might avoid the 5.9 percent grade section and use the old highway during the winter. I disagree with that assumption. There are some pretty steep sections of the Seward Highway which are successfully navigated year round.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

My big concern is about the mitigation funds scheduled for the Snow River area. I strongly feel that these funds need to be used to develop recreational opportunity within the immediate Cooper Landing area. The bypass is desperately needed. However, it will divert traffic and dollars away from the businesses within the Cooper Landing community.

RESPONSE: The proposed mitigation is specific to the Resurrection Pass Trail and was proposed and coordinated with the Forest Service, U.S. Department of Agriculture (Forest Service) as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation to local community trails.

ID: 1402 **Source:** Web **Date Submitted:** 4/5/2018
Name: Jennifer Harpe
Organization: Kenai River Fly Fishing

Sterling Highway MP 45-60 Project Planners,

My name is Jen and I support a Walkable Cooper Landing because this town is is the town being affected by the byass, not Moose Pass. Mitigation over in another, completely unaffected community reflects very poorly on this project and their planners. Mitigation should be done for COOPER LANDING, and walkable communities is by far the best project for it.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46 where the path leaves the existing Our Point of View roadway. The MP 45-60 Project Design does not appear to address or provide

safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the "safety trail") that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the "safety path" that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and we feel that failing to provide this crossing is negligent.

RESPONSE: A trail connection to replace the Safety Path will be created on the south side of the Sterling Highway so path users will not have to cross the highway at Quartz Creek Road. .

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

RESPONSE: The proposed mitigation is specific to the Resurrection Pass Trail and was proposed and coordinated with the Forest Service as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation to local community trails.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

RESPONSE: The Juneau Creek Alternative bypasses the location where this comment suggests mitigation. Because the area would bypassed, highway traffic would be reduced along this stretch by 70 percent, which would reduce the environmental consequences at this location. Because the project is not exacerbating the effects in this location, mitigation is not proposed.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

RESPONSE: The Juneau Creek Alternative bypasses the location where this comment suggests mitigation. Because the area would bypassed, highway traffic would be reduced along this stretch by 70 percent, which would reduce the environmental consequences at this location. Because the project is not exacerbating the effects in this location, mitigation is not proposed.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

RESPONSE: While nothing is currently proposed that would legally prevent trucks from using the "old highway," it is anticipated that the wider lane width, shoulders, clear zone, easier curves, passing lanes, higher speed limits, and ability to maintain consistent speeds will cause most truck traffic not destined for Cooper Landing to use the main highway under all build alternatives. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway and that the remaining old highway would be reclassified to function as a minor arterial or major collector. With less traffic, and traffic that is primarily destined for local Cooper Landing destinations, the remaining existing highway through town would safely function to provide access to adjacent properties. The EIS recognizes that during some winter conditions, commercial operators may choose to use the old highway. In such cases, the risk of spills is no greater than would be experienced under the no build condition. However, under most operating conditions, trucks will use the Juneau Creek Alternative alignment, resulting in a substantial reduction in spill risk to the Kenai River.

Because of similar questions expressed during the Draft EIS, DOT&PF conducted additional analysis. For the Final EIS, a new crash analysis was added to Appendix A. That analysis predicts a 69.7 percent reduction in crashes if the Juneau Creek Alternative is built, compared to the No Build Alternative. Truck crashes were also estimated for the design year with 2.8 crashes predicted for the No Build Alternative and only 1.1 estimated for the Juneau Creek Alternative.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
Jen Harpe

ID: 1404 **Source:** Web **Date Submitted:** 4/5/2018
Name: Darla VanLeuven
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Darla and I support a Walkable Cooper Landing because I use the existing pathway for five months each year for the past eight years as my running path. I enjoy the Cooper Landing area greatly and file path would be a great benefit to all residents and visitors.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46 where the path leaves the existing Our Point of View roadway. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and we feel that failing to provide this crossing is negligent.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
Darla VanLeuven

ID: 1405 **Source:** Web **Date Submitted:** 4/5/2018
Name: Virginia Morgan
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Virginia Morgan, and I support a Walkable Cooper Landing because my family chooses to travel on foot, by bike, or skis, year-round. I was raised here as a child, and have come back to raise my own children. Every single day, my husband depends on our safety path to go to work, and our children regularly walk or ride their bikes to school. We use the safely path to go to the post office, library, local

businesses, campgrounds, and Kenai Lake beach. Cooper Landing has some of the best trails in the state, and our safety path has been our community's best attempt to link those trails while providing safer passage for those who want to travel on foot, bikes, or skis, within the community.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46 where the path leaves the existing Our Point of View roadway. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and we feel that failing to provide this crossing is negligent.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek

where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
Virginia Morgan

ID: 1406 **Source:** Web **Date Submitted:** 4/5/2018
Name: Anna Carlson
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Anna Carlson and I support a Walkable Cooper Landing.

My husband is a fishing guide in Cooper Landing and during the summer our family (myself, my husband, our infant daughter and our dog) lives in the community.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the “Safety Path” to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users’ ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46 where the path leaves the existing Our Point of View roadway. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and we feel that failing to provide this crossing is negligent.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities

to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
Anna Carlson

ID: 1407 **Source:** Web **Date Submitted:** 4/5/2018
Name: Patricia Berkhahn
Organization:

I reviewed the Sterling Highway MP 45-60 Final EIS and Evaluation. I am opposed to the Juneau Creek Alternative and have several comments and suggestions:

- This alternative adds another huge footprint to the Kenai River Watershed
- The proposed route has the largest affect on destroying important wetlands and vegetation in the Kenai River Watershed
- The Juneau Creek alternative has the greatest impact on wildlife habitat loss
- The visual impact of the proposed route is negative particularly at the pristine current Juneau Falls overlook. This is a favorite hike for Peninsula residents for its visual attractiveness.
- There will still be heavy traffic on the existing road and with no improvements on that road there will continue to be accidents with environmental threats on the Kenai River.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

Now there will be addtional environmental threats in the Kenai River Watershed with the existing road plus the proposed road. There is still the possibility of a spill in the Kenai River with the current road as there are no road improvements planned plus potential spills higher in the watershed that can affect tributaries and ultimately the Kenai River.

RESPONSE: The purpose of the project is not to eliminate the risk of spills in the Kenai River. The purpose and need for the project is to reduce congestion, bring the highway up to current standards, and improve safety. Compared to the other build alternatives, the Juneau Creek Alternative performs the best on measurable purpose and need criteria. The data bear out that the Juneau Creek alignment will substantially reduce the risk of crashes, including truck crashes; has considerably less of its alignment in proximity to the Kenai River and other Tier 1 streams (reducing the potential that should a spill occur, it would reach the steam or river system); and allows more time to respond, as compared to other alternatives, should a spill reach a stream.

- Grade is steep on the proposed road - will commercial truck traffic with full loads still choose the existing road during winter conditions?

RESPONSE: While nothing is currently proposed that would legally prevent trucks from using the "old

highway," it is anticipated that the wider lane width, shoulders, clear zone, easier curves, passing lanes, higher speed limits, and ability to maintain consistent speeds will cause most truck traffic not destined for Cooper Landing to use the main highway under all build alternatives. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the remaining old highway would be reclassified to function as a minor arterial or major collector. The EIS recognizes that during some winter conditions, commercial operators may choose to use the old highway. In such cases, the risk of spills is no greater than would be experienced under the no build condition. However, under most operating conditions, trucks will use the Juneau Creek Alternative, resulting in a substantial reduction in spill risk to the Kenai River.

- No improvements on the existing road leave pedestrian traffic particularly across the Cooper Creek bridge life threatening. Have you walked across that bridge? I have and it's extremely hazardous.

RESPONSE: DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the old highway would be reclassified to function as a minor arterial or major collector. This will improve the safety on the Cooper Creek Bridge and provides opportunities for the community to implement the Walkable Community Project on the old highway.

- No in lieu mitigation is planned. Every opportunity to purchase Kenai River and tributary adjacent lands for conservation easements should be made.

RESPONSE: The impacts associated with wetland fill have been fully disclosed in the Final EIS, and wetland mitigation to compensate for wetland loss has been proposed. DOT&PF is undertaking a permitting process where wetland mitigation will be refined.

- I oppose the changes to the Resurrection Trail to a new front country feel instead of the current backcountry feel the proposed road would bring. The remoteness of these trails near populated areas ensure these are some of the best trails in the State.

- I oppose new trailheads and parking areas added to this bypass. There are already trailheads to these routes - adding pullouts adds more impact and environmental damage. This road is proposed as a bypass it should be left as a bypass. Underpasses are necessary, but if there aren't adequate wildlife crossing, the underpasses pose user conflicts with humans, bears, and moose. I understand the number of wildlife passes have been reduce to save money. More wildlife passes are needed for this proposed road. I personally do not want to cross paths with a brown bear at an underpass designed for people and wildlife! Pullouts create garbage - outhouses in Alaska are notoriously known for inadequate maintenance and shuttering in the winter. Folks are disgusted and go in the woods and litter their toilet paper everywhere. This is disgusting and a health hazard. Do not add pullouts to this proposed bypass. Folks can use the existing trailheads - this will help to maintain a backcountry feel to this wonderful trail system.

RESPONSE: DOT&PF and FHWA worked with adjacent land managers and have agreed to provide pull-out parking where those managers need/desire it to support their land management objectives. The land managers requested these pullouts and have agreed to maintain them. Wildlife crossing structures have not been “reduced to save money.” A wildlife mitigation study was performed, and study data have been incorporated into the locations proposed for establishing crossings along the alternatives. The point of the study is to place the crossings at locations where moose, bears, and other wildlife are most likely to cross. Fencing, or other designed features, to funnel wildlife to the designated crossing areas is anticipated as

part of the crossing design.

- The proposed route adds incredible noise to the current wilderness and residential areas. DOT & PF admitted there are no alternatives to mitigate noise impacts to this area.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

I strongly believe you have chosen the wrong alternative and need to go back to the drawing board and find a way to fix the existing road as best as possible and minimize impacts to the watershed instead of creating a entire new footprint as lengthy as the Juneau Creek Alternative.

ID: 1408 **Source:** Web **Date Submitted:** 4/5/2018
Name: Grant Story
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Grant Story and I support a Walkable Cooper Landing because Cooper Landing is an incredibly special place. My son and daughter-in-law are permanent residents and active in the community and active in attempting to make Cooper Landing even more inviting and safe for all who love the outdoors. We visit Cooper Landing regularly and hope that the Sterling Highway MP 45060 Project will be positively reevaluated by project planners.

Project planners should reevaluate the following considerations:

- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46 where the path leaves the existing Our Point of View roadway. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the

Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and we feel that failing to provide this crossing is negligent.

- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
- Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
- Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.
- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
Grant Story

ID: 1409 **Source:** Web **Date Submitted:** 4/5/2018
Name: Kathryn Recken
Organization:

Comments On Sterling Highway MP 45-60 Project
Final Enviromental Impact Statement and Final Section 4(f) Evaluation

1. The proposed mitigation project that is planned for the Snow River Bridges needs to be reevaluated. Applying the mitigation to the Snow River and a different trail does not address the negative impact the bypass project will have on the Resurrection Pass Trail, the local economy or the community upheaval Cooper Landing will experience.

RESPONSE: The proposed mitigation is specific to the Resurrection Pass Trail and was proposed and

coordinated with the Forest Service as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation related to local community trails.

Building and improving trail segments within the current highway right-of-way that would connect Cooper Landing residents and visitors to the Resurrection Pass Trail and the other surrounding public lands, facilities and businesses is a more appropriate use of mitigation opportunities. Construction of pedestrian walkways along the old highway east of the current Resurrection Pass trailhead, where only narrow and dangerous shoulders exist, is a strong suggestion for mitigation. Doing so would provide the affected community and its visitors with user access to the affected Resurrection Pass Trail System.

RESPONSE: The Juneau Creek Alternative bypasses the location where this comment suggests mitigation. Because the area would be bypassed, highway traffic would be reduced along this stretch by 70 percent, which would reduce the environmental consequences at this location. Because the project is not exacerbating the affects in this location, mitigation is not proposed.

2. Project plans need to address safe pedestrian and non-motorized access to trails and areas on the north side of the project (Coyote Notch area, Cooper Landing Safe Path Trail and Langille Mountain) at the east end of the bypass.

RESPONSE: The informal path referred to as the “safety trail” has been considered, and DOT&PF and FHWA have committed to including a roadside path between Quartz Creek Road and the intersection of the Juneau Creek Alternative with the “old” highway. Access to trails in the Coyote Notch area on the north side of the highway are outside the project area and would not be affected.

3. Efficient and safe highway access at both the east and west ends of the bypass for Cooper Landing residents and visitors needs to be engineered and become part of the project. A simple “T” intersection with a stop sign on the old highway at either end is not sufficient.

RESPONSE: The intersections will be engineered to be safe and meet the traveling needs commensurate with a NHS facility. The intersections are planned to have turn lanes and would be lit to facilitate the safe exchange of traffic between the old and new highways.

4. Scenic Lookout points are an important part of a “Scenic Highway”. These need to be provided along the new bypass route.
5. Camping and overnight parking should not be allowed at pullouts along the bypass or at the Resurrection Trailhead parking lot.

RESPONSE: DOT&PF and FHWA worked with adjacent land managers and have agreed to provide pull-outs (whether to access trails or for scenic purposes) where those managers need/desire it to support their land management objectives. Camping is not anticipated to be allowed at pullouts or the new Resurrection Pass trailhead; however, overnight parking is likely where long-distance trail use would be anticipated. Bathrooms and refuse containers are planned at the new Resurrection Pass trailhead.

6. Providing bathrooms and maintained refuse containers at the Resurrection Trailhead Parking Lot along the bypass will be extremely important for a safe and sanitary environment in what will be a high use area.

RESPONSE Bathrooms and refuse containers are planned at the new Resurrection Pass trailhead.

7. Signage at each end of the bypass indicating the current highway as a “Local Business Loop” would highlight our town and help support our impacted businesses.

RESPONSE: Signage at each end of the old highway to indicate the business district is planned as part of the project.

Thank you for your consideration of the points above.

ID: 1411 **Source:** Web **Date Submitted:** 4/6/2018
Name: Thomas Allison
Organization:

We oppose the building of the bypass in Cooper Landing. The reasons are: destroying and disturbing more wilderness area and wildlife habitat to provide the roadway above the river and the town of CL; speeding up traffic and travel to Anchorage, which is already way too much especially in the summer; way too much money; diverting traffic cutting business to the community of CL. We agree it is somewhat scary driving thru CL any time of year, narrow road and winding, but if everyone slows down, it is so beautiful thru there with views of the river, that it is truly much better to leave the hwy right where it is.

RESPONSE: The purpose of the project is to reduce congestion, bring the highway up to modern standards, and improve safety, not to speed up travel to Anchorage. DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources.

ID: 1412 **Source:** Web **Date Submitted:** 4/6/2018
Name: David Story
Organization:

Sterling Highway MP 45-60 Project Planners,

My name is David Story. I live and work in Cooper Landing year round and am a regular user throughout the year of the Safety Path that parallels the existing Sterling Hwy. I use it to get to my home on Quartz Creek Road, my work near mile 50, the community school where I volunteer, the local trails and around town. I use this trail on foot or by bicycle.

I am a member of the Walkable Community Steering Committee and want to make sure that pedestrian and bicycle traffic is recognized as an important and as a required part of all federal and state transportation projects and planning.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the “Safety Path” to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate and include the following considerations:

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

RESPONSE: While nothing is currently proposed that would legally prevent trucks from using the "old highway," it is anticipated that the wider lane width, shoulders, clear zone, easier curves, passing lanes, higher speed limit, and ability to maintain consistent speeds will cause most truck traffic not destined for Cooper Landing to use the main highway under all build alternatives. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the remaining old highway would be reclassified to function as a minor arterial or major collector. With less traffic, and traffic that is primarily destined for local Cooper Landing destinations, the remaining existing highway through town would safely function to provide access to adjacent properties. The EIS recognizes that during some winter conditions, commercial operators may choose to use the old highway. In such cases, the risk of spills is no greater than would be experienced under the no build condition. However, under most operating conditions, trucks will use the Juneau Creek Alternative, resulting in a substantial reduction in spill risk to the Kenai River. Because of similar questions expressed during the Draft EIS, DOT&PF conducted additional analysis. For the Final EIS, a new crash analysis was added to Appendix A. That analysis predicts a 69.7 percent reduction in crashes if the Juneau Creek Alternative is built, compared to the No Build Alternative. Truck crashes were also estimated for the design year, with 2.8 crashes predicted for the No Build Alternative and only 1.1 estimated for the Juneau Creek Alternative.

There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.

Outhouse sites must be provided and maintained at the Juneau Falls pull out.

RESPONSE: DOT&PF and FHWA worked with adjacent land managers and have agreed to provide pull-outs (whether to access trails or for scenic purposes) where those managers need/desire it to support their land management objectives. The pullouts will be managed by the adjacent managers. Camping is not anticipated to be allowed; however, overnight parking is likely where long-distance trail use would be anticipated. Bathrooms and refuse containers are planned at the Resurrection Pass trailhead.

The bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.

RESPONSE: DOT&PF has agreed to complete a vegetation plan during final design and will be working with land managers to appropriately revegetate and restore impacted areas. The goal of revegetating waste disposal sites will be to return them to a natural state. By using design features such as boulders or vegetation, DOT&PF will not allow unauthorized access to the restored areas, ensuring they do not become de facto rest stops or camp sites.

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

RESPONSE: See response at ID 1402.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

RESPONSE: See response at ID 1402.

The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.

It cannot be overstated that there should not be any driveway permits or other methods of road access to the bypass aside from the two designated parking lots associated with the Juneau Falls trail.

RESPONSE: As explained in Section 2.6.2 of the EIS, access to those segments of each alternative that would be built on a new alignment would be controlled and DOT&PF will not provide driveways. For the Juneau Creek Alternative, DOT&PF has agreed to reserve access for a potential connection using ramps to the rural residential development on State Management Unit 395. A connection would also be reserved for the Cook Inlet Region, Inc. (CIRI) Tract A development near the connection of the old and proposed highway segments under the Juneau Creek Alternative. The new highway is intended to serve the mobility of through traffic. By not allowing additional new access roads and driveways, DOT&PF can keep that portion of the new highway functioning at a high level, improve safety, and reduce congestion. By not permitting driveway access, DOT&PF can also avoid inducing commercial development and sprawl. The

pullouts and trailheads proposed in each alternative are to provide access where alternative access does not already exist and are part of negotiated mitigation for effects to recreational resources.

Highway exit signs should include a suite of information that recognizes and honors Cooper Landing's services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.

RESPONSE: As part of the project, signage is planned at each end of the “old” highway to indicate the business district.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

RESPONSE: See the response at ID 1402.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

RESPONSE: See the response at ID 1402.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

RESPONSE: See the response at ID 1402.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

RESPONSE: See the response at ID 1402.

Thank you for your consideration.

Sincerely,
David Story

ID: 1413 **Source:** Web **Date Submitted:** 4/7/2018
Name: Frank Turpin
Organization:

With regard to the land swap with CIRI enabling final selection of the Juneau Creek Alternative, please add acreage to the swap for cell tower sites in the vicinity of the Sterling Highway. These would be sited in portions of Refuge Area that lack cell phone coverage. CIRI would become the land owner of these sites and could then enter into agreements with telecommunication companies. This is in the interest of highway safety.

RESPONSE: DOT&PF and FHWA are not a party to the land swap and do not have control over what acreage gets transferred.

ID: 1414 **Source:** Email **Date Submitted:** 4/7/2018
Name: William Blake
Organization:

Yes, build this road. The Juneau creek alternative is the best choice. The number one reason will be the lives of many Alaskans will be saved by allowing people to bypass the worst part of the Sterling Hwy. Other reasons the Juneau creek alternative is a good idea are the reduction in time and expense it will take to go to and from the Kenai Peninsula. The current hwy thru Cooper Landing is probably the most dangerous stretch of road in Alaska only because of its location. Any one who would disagree has never met a tractor trailer pulling doubles in the middle of a snow storm at night on this stretch of road. The Juneau creek alternative is the right choice and is long over due. Yes build this road.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

Sincerely,
William Blake
29071 Cohoe Loop Road
Kasilof, Alaska

Resident of the Kenai Peninsula for 54 years.

ID: 1415 **Source:** Web **Date Submitted:** 4/7/2018
Name: McKenzie Kimball
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is McKenzie and I support a Walkable Cooper Landing because as an employee at Alaska Wildland Adventures I participate in the community of Cooper Landing and love to explore the area on foot and by bike. I hope to keep a safe and walkable community for future adventures!

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be
you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
McKenzie Kimball

ID: 1416 **Source:** Web **Date Submitted:** 4/7/2018
Name: Steven Frerichs
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

My name is Steven Frerichs. I support a Walkable Cooper Landing. After working and walking the streets for two years I belive some important changes need to be made for people safety.
Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic

and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
Steven Frerichs

ID: 1417 **Source:** Web **Date Submitted:** 4/8/2018
Name: Stephanie Anthony
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Hello, my name is Stephanie and I think Cooper Landing should be a walkable community for the following reasons.

I have called Cooper Landing my summer home for the past 3 summers. I work seasonally at a company called Alaska Wildland Adventures located at mile post 50.1 along the Sterling Highway. As my fellow working class people may know, it's very important to get to and from work as safe as possible. One way we do that is by foot or bicycle. Sharing the highway using a small narrow path parallel to cars, campers, trailers, and large semi trucks traveling at high speeds, along the same route as a pedestrian path has always been startling for my morning commute. Making the community of Cooper Landing as safe as possible and not only improving the road system, but including the improvements of current pedestrian paths for increased safety is immensely important. All along the highway the roads and paths are consistently used for work, recreational use, access to camp grounds, hiking trials, fishing spots, schools, tourism business, and restaurants. Hundreds if not thousands of people, including myself partake in these activities during the summer and it needs to be a priority in addition to the existing plan to make Cooper Landing a safe and walkable community for all.

For further reasons that personally affect me regarding this project:

- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation

System Unit.

- Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass
- Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.
- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Warm regards,
Stephanie Anthony

ID: 1418 **Source:** Web **Date Submitted:** 4/8/2018
Name: Tanner VanLeuven
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Tanner VanLeuven and I feel that a Walkable Cooper Landing is important for the following reason.

The pedestrian access within the Cooper Landing section of the Sterling Highway provides many benefits to residents, seasonal workers and visitors that I feel should be strongly considered in the proposed bypass project. My own personal experience with the pedestrian path on the sterling Highway is contained primarily to the section between mile 48 to 50, however I feel that the importance of this section can be applied to the greater Cooper Landing community for all pedestrian access routes.

These routes are used on a daily basis by many seasonal workers to access not only work but also recreation within the area. I often see residents, seasonal workers and visitors using the trail system

along the highway for exercise and sight-seeing. In many places along the highway these trail systems are mandatory to safely navigate between homes, businesses or recreation sites. Without them, pedestrian access to certain areas would become extremely hazardous and impractical. I believe they provide a benefit to any person in Cooper Landing, whether they be passing through, working seasonally or permanently residing there, that is not to be overlooked in any proposed highway modification or improvement, future or present.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

The following are additional reasons that, I and many other, temporary and permemant Cooper Landing residents feel the pedestrian access is important:

- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

- Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

- Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

- Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

- Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within

the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,

Tanner VanLeuven

ID: 1419 **Source:** Web **Date Submitted:** 4/8/2018
Name: Betty Cremmins
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Dear Sterling Highway MP 45-60 Project Planners,

My name is Betty and I support a Walkable Cooper Landing because it is one of the most beautiful locations I have ever visited but I felt wildly unsafe due to the relentless traffic.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues

created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Please enable Cooper Landing to be accessible and safe for all who live there and visit.
Sincerely,
Betty Cremmins

ID: 1420 **Source:** Web **Date Submitted:** 4/8/2018
Name: Brendan Wells
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Dear Sterling Highway MP 45-60 Project Planners,

My name is Brendan Wells and I support a Walkable Cooper Landing because I have used the "Safety Path" since I was a child. Some of my most early memories of Cooper Landing are getting pulled in a wagon down this path and learning to ride my bike here. In my adult life, I use the path to exercise by both running and biking on the path frequently throughout the summer. I have also used the path to access the Kenai River for fishing and recreational paddling. When I describe Cooper Landing to friends and family who want to come visit, this is always one of the great features of the town I mention to them.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely, Brendan Wells

ID: 1421 **Source:** Web **Date Submitted:** 4/8/2018
Name: Kimberly Layton
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Kimberly Layton and I support a Walkable Cooper Landing because as someone who has lived and worked in Cooper Landing for many summers, I know how important safe walking paths are for

the residents and visitors in that town.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the

transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely, Kimberly Layton

ID: 1422 **Source:** Web **Date Submitted:** 4/8/2018
Name: Rebecca Lean
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Reba Lean and I am attaching my letter of support of a Walkable Cooper Landing. I grew up visiting Cooper Landing each summer at my family's property near mile 49. We would often walk to the stores or other homes rather than drive, and it was quite a scary experience for a young girl who did not spend most of her time near highways. I would feel much more comfortable knowing my children will grow up with safe walking and biking paths as we continue to visit Cooper Landing.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,

Reba Lean

ID: 1423 **Source:** Web **Date Submitted:** 4/9/2018
Name: Jennifer Harpe
Organization:

Something to consider is the Russian Gap road turn off. Currently with the flow of traffic it is already incredibly dangerous to turn left onto Russian Gap road when heading north. It is very deadly to be in the left hand "passing" lane to initiate the turn. Adding a turning lane in the section would be, life saving. Russian Gap is located directly across from transfer station, at the beginning of the project. Thank you.

RESPONSE: Russian Gap Road is just outside the project limits and no construction is planned for that location.

ID: 1424 **Source:** Web **Date Submitted:** 4/9/2018
Name: Alec Lamberson
Organization: Kenai Experience Inc.

While I favor the recent change to the plan which will rejoin the Sterling Hwy. west of The Russian River ferry opposed the the previous plan of rejoining just east of Gwins Lodge. I feel the plan of rejoining the highway near Jim's landing would be the most favorable and have the most significant positive impact. This would relieve congestion the most and provide safer highway travel.

RESPONSE: Connecting farther west would have impacts to the Kenai National Wildlife Refuge (KNWR) and designated Wilderness. The KNWR is protected by Section 4(f) of the United States Department of Transportation (USDOT) Act. Efforts to reduce impacts to the refuge while providing acceptable grades were key factors in connecting the Juneau Creek Alternative at the proposed connection point.

While feel a bypass of Cooper Landing may have a positive affect on the community and highway travelers, I believe the real solution to the problem would be a bridge over the Turnagain Arm. I know this may sound extreme, but it would be the best solution for the long term. This bridge would cross just south of Anchorage and land on the northern Kenai peninsula north of Mystery Creek Road. This would provide a second route to and from the peninsula and remove the majority of the traffic from the scenic byway and out of avalanche danger.

RESPONSE: An alternate route from Anchorage across Turnagain Arm to connect to the Kenai Peninsula would have an entirely different purpose and need as this project. However, the concept of alternative

regional highways that avoid this project area is addressed in Section 4.4.2 of the EIS in the context of Section 4(f).

ID: 1425 **Source:** Web **Date Submitted:** 4/9/2018
Name: Keith Mantey
Organization: Gwin's Lodge Historic Roadhouse Since 1952

The community of Cooper Landing really needs a walkable and RIDEABLE trail going TO the Russian River campground entrance 1/2 mile down from Gwin's Lodge (milepost 52). An additional trail extending to the Russian River Ferry would be best also. The highway is very dangerous and narrow and these key resources are not accessible for those that don't want to be in a car all the time and would like to walk, jog, or bike. This would greatly aid tourism which will be hurt by the by-pass project.

RESPONSE: DOT&PF anticipates that the new highway will draw 70 percent of the traffic off of the old highway and that the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway.

I would prefer to see the by-pass as a TOLL ROAD that larger, non-local, trucks are required to take. This would leave some traffic on the existing highway yet force the dangerous trucks, and those in a rush, off this section of twisty road. The TOLLS could help pay for the additional trails and maintenance, plus, part be paid to local businesses to help pay for added marketing that would help replace the lost business due to the bypass directly reducing business traffic. Note that there has been no contact made to assess damage to local businesses as typically required. If half the traffic is eliminated it would severely affect all businesses. A tollway would help keep some traffic on the local road. Thanks, Keith Mantey, Gwin's Lodge Historic Roadhouse since 1952

RESPONSE: The DOT&PF has proposed a means to fund the project, and it does not include tolls. The idea of converting the Sterling Highway to a toll facility would need to be considered at a policy level beyond the scope of this project. See Appendix H (*Initial Financial Plan*) of the Final SEIS for the project's proposed funding plan. Of note, during the project's scoping phase, the project team did conduct special outreach efforts to the business community to understand their issues and make sure their concerns were reflected in the scope of the analysis. This outreach is summarized in Chapter 5.0.

ID: 1426 **Source:** Web **Date Submitted:** 4/9/2018
Name: Joey VanLeuven
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Joey VanLeuven and I support a Walkable Cooper Landing because I enjoy the Cooper Landing area. I have spent my last 9 summers in Cooper Landing and think the walking path would benefit the area.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round. I have participated in the run 3 years and the path would make this event much more user friendly.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System

Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,

Joey VanLeuven

ID: 1429 **Source:** Email **Date Submitted:** 4/10/2018
Name: Ted Spraker
Organization:

Please consider my comments regarding the Sterling Highway project. Thank-you, Ted Spraker

Attached text follows:

April 10, 2018

Brian Elliott
DOT&PF Central Region Environmental Manager
P.O. Box 196900,
Anchorage, AK 99519-6900

Thank you for the opportunity to offer my personal comments on Cooper Landing MP 45-60 Highway relocation project. As a retired wildlife biologist, having worked for the Department of Fish and Game (ADF&G) for 28 years with 24 as Area Biologist for Kenai Peninsula, I have followed this effort since my first meeting on the plan in 1983. This process has but long in the making but I am pleased you have made the best choice for travelers, the community and resident wildlife. The Juneau Creek Alternative is clearly the best route.

In my efforts to follow this process, I read a recent article, “Bypass may bump businesses, boggle bears” in our local Peninsula Clarion on March 31, 2018. In addition to the information provided in the piece, I was not surprised to read the “sky is following” comments provided by Kenai National Refuge staff. While

the refuge staff focused on the alleged negative impacts to wildlife in the Juneau Creek area, they once again fail to mention the potential catastrophic impact to wildlife if hazard materials are spilled into the river. Supporting a build alternative away from the River is without a doubt the most sensible choice.

Having been involved with bear research projects, in several parts of the state including locally, and years of frequent discussion with Alaskan residents recreating in the outdoors, I cannot support their over stated concerns about impacts to bears. It was not surprising to learn that collared bears use this area for travel, however, what was not shared was that bears surely use other travel areas equally as often. This project will not stop travel or limit bear's movements. Additionally, the Juneau Creek area supports a low number of bears when compared to the Russian River drainage, which encompasses the G-South alternative. When working for the Department, I noted that the bear density was much greater on the Russian River side compared to the Juneau Creek side by comparing moose calf survival. As it has been shown in several studies, predation on moose calves by bears is the primary controlling factor for their survival. The Russian River area revealed the lowest calf to cow ratios on the Peninsula. This information and local experience in the area strongly suggests that most bear travel is along the Russian River, not Juneau Creek.

Any time a development of this magnitude is undertaken the local area will experience change, however, I am not concerned that it will result in a measurable impact to local wildlife, and there are safeguards in place adopted by the ADF&G and the Board of Game. When considering the welfare of local bears, one must understand their ability to adapt, the population's resilience and the current harvest program that protects bears, especially sows and cubs. We have a brown bear harvest program for the Kenai Peninsula which allows the harvest of up to 60 bears, with a maximum harvest of 12 adult females annually. This process accounts for all forms of bear mortality. The reported harvests for the past couple years has been about 35 brown bears, comprised of an average of 6 adult females, well below the allowable harvest quota.

I also believe the Juneau Creek alternative will have a positive impact for people that want to use the area for recreation, providing greater access to public lands.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm. DOT&PF and FHWA have worked with biologists from the Forest Service, U.S. Fish and Wildlife Service (USFWS), and Alaska Department of Fish and Game (ADF&G) to develop a mitigation plan to provide crossing locations for wildlife based on modeling and camera trap data produced for the project.

Best Regards,
Ted Spraker,
49230 Victoria Ave
Soldotna, AK 99669

Retired F&G Biologist

Chairman of Board of Game

ID: 1432 **Source:** Web **Date Submitted:** 4/11/2018
Name: Gil Carr
Organization:

Hello,
Please consider bicycle and pedestrian access with the project. When I ride my road bike through the area now, it's taking a large risk as there is no shoulder currently. With true, separate, bike/walking paths, we could have a wonderful, accessible option for the large amounts of visitors to the area, especially in summer.

RESPONSE: Each of the build alternatives will have an 8-foot shoulder, which meets the safety requirements for bicycles and pedestrians along a Rural Principal Arterial highway. Given the level of bicycle and pedestrian activity on the highway outside of Cooper Landing, DOT&PF believes the wider lanes and shoulders would sufficiently increase safety for pedestrians and bicyclists along the new highway segments. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway.

ID: 1433 **Source:** Web **Date Submitted:** 4/11/2018
Name: Virginia Morgan
Organization: Cooper Landing Community School

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- The Safety Path running along the Sterling Highway, between MP 45 and 50, was created in 1993 to

provide a safer means of pedestrian travel within the community. (http://www.walkcooperlanding.org/historical-timeline/) It is the only way for students and staff to safely walk or bicycle to school. Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.
- It cannot be overstated that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.

RESPONSE: The construction contractor may provide opportunities to allow individuals to use the trees cleared for the project in similar fashion to the approach used on the Sterling MP 58–79 project.

- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
  - Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
    - Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
  - Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation

System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

ID: 1434 **Source:** Web **Date Submitted:** 4/12/2018
Name: Joel Wieman
Organization:

I have commented a couple of times in the past but wanted to state my views one last time. The route that by passes Cooper Landing by crossing Juneau Creek is by far the best alternative. It will allow the community to be a quiet community with only local traffic. This will allow pedestrians and bicyclists to move freely through out the town with out fear of being killed by constant traffic. Property values along the existing highway will increase as businesses will be more user friendly and inviting. Cooper Landing will become a destination in which to stay rather than a wide spot on the road that is uninviting and dangerous. I have owned property in Cooper Landing for more than 20 years and my family has owned property there since the early 50's. I am near retirement now and plan to spend much more time there. I only wish this road improvement was done twenty years ago. Future generations will thank you for choosing the Juneau Creek alternative. Just one more point. Many have bemoaned the loss of the "original Resurection Pass trail". This is not the case. The original trail actually went up what is now Bean Creek Road. People traveled by boat from the Seward end of the lake and began the treck to Hope from where the bridge is located now. Others walked from Seward, and they walked to where the bridge is now and crossed by boat there to begin the trail at Bean Creek Road. This was the trail I used as a child. There was no Reserection Trail head leaving from the highway. Historically it is a new development.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1435 **Source:** Web **Date Submitted:** 4/12/2018
Name: Tara Schmidt
Organization:

I have read through the EIS and the associated impacts with the Juneau Creek Alternative. I must say that I am extremely disappointed with the decision to move forward with this proposed route. The impacts to the recreational/ wilderness qualities of this very popular and well used area are truly vast. The road will open this area to a class of recreationalist that will have a lasting impact as I am sure we will see an increase in ORV accessing USFS lands and increasing pressures in the Kenai NWR lands that are designated wilderness. I also think the cost is prohibitively expensive. The Copper Creek Alternative would be such a better choice to truly address the goals of improving this highway. I am also dubious about the proposed reroute of the trails under one underpass that will also serve as crossing for bears accessing Juneau Creek Falls. That just seems disastrous as far as human – wildlife interaction.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the

alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

After reviewing the maps that were provided in Appendix I, it's evident to me that the section of highway near the Fuller Creek crossing is the most problematic as far as addressing wildlife impacts. Since one of the stated goals of the project is safety why is there a passing lane just prior to this section of highway? We all know that vehicle traffic will increase to greater than 65 mph when you have 3 lanes – and this is at a place that has been identified as a "hot spot" due to the river to the south and the important habitat to the north of the highway. Furthermore you are increasing the impervious surface area along the Kenai River. Isn't one of the stated reasons for choosing the Juneau Creek Alternative to protect the River? This eastbound passing lane makes no sense due to its proximity to the Kenai.
Please reconsider this section of highway.

RESPONSE: DOT&PF considered eliminating one or both passing lanes in this area. However, DOT&PF determined they are important to meeting the overall purpose and need. The passing lanes are important safety and congestion relief improvements, and relieving congestion and improving safety are core parts of the project purpose and need. With the busy Sportsman's Landing located at MP 55, a USFWS requested pullout/parking area retained at MP 55.6, the Fuller Lakes Trailhead located near MP 57.2, the KNWR Visitor Contact Station located near MP 57.8, and Jim's Landing/Skilak Lake Road located at MP 58, there are multiple points in this area where recreational vehicles (often large/slow) will be slowing to exit the highway or accelerating onto the highway. Passing lanes allow traffic to sort itself out and relieve congestion under these conditions, and they keep people from attempting to pass these vehicles at unsafe locations.

I hope as DOT develops the bid proposals for the construction phase of this highway there is language for BMP that will address the likelihood of the introduction of non-native species of plants as a result of contaminated equipment. There are established protocols that can minimize this impact, and it is time for DOT to start taking this seriously. This is particularly important in an area that is currently undeveloped and with such high habitat value.

RESPONSE: DOT&PF is addressing the Alaska Highway system as a vector for the spread of invasive plants via the Maintenance & Operations (M&O) Best Management Practices (BMPs) being implemented, construction BMPs being implemented during project work, the use of weed-free products (when available and feasible), coordination with local weed prevention groups, and the DOT&PF Integrated Vegetation Management Plan (IVMP), which is usable by DOT&PF and other agencies on state-owned airports and highway right-of-ways. However, maintaining the proposed project area to prevent the long-term spread of invasive species goes beyond the timeline of the project and is part of a DOT&PF system-wide maintenance effort that increases tools and awareness as time progresses. Once a FHWA-funded project is constructed, the state-funded DOT&PF M&O section becomes responsible for all aspects of the project area, including vegetation control. Monitoring and working to prevent the spread of invasive species has been increasing in priority for DOT&PF M&O, and M&O will continue to work to address the preservation of natural vegetation on this highway segment, as well as adjoining segments.

As part of the design phase of this project DOT&PF will negotiate an agreement to provide funding to the USFWS and/or Forest Service for post-construction monitoring and control of invasive species, similar to the approach being used to address this issue on the adjacent Sterling Highway MP 58–79 project. Weed-free material sites are evaluated annually for recertification.

ID: 1437 **Source:** Email **Date Submitted:** 4/13/2018
Name: Chris Degernes
Organization:

Please accept my attached letter of comment on the Sterling Highway MP45-60 FEIS. Thank you,
Chris Degernes

Sent from Mail https://go.microsoft.com/fwlink/?LinkId=550986 for Windows 10

RESPONSE: Attached text is found at ID 1512

ID: 1438 **Source:** Web **Date Submitted:** 4/13/2018
Name: William Berkhahn
Organization:

I reviewed the Sterling Highway MP 45-60 Final EIS and Evaluation. Now that the decision has named the Juneau Creek Alternative as the preferred alignment of the Sterling Highway MP 45-60 here are my concerns and suggestions:

- This alternative adds another large unnatural development footprint to the Kenai River Watershed and has a large negative affect on important wetlands and vegetation. It has the greatest impact on wildlife habitat loss than the other alternatives.
- The preferred route is particularly negative at the pristine Juneau Falls. This is a favorite hike for Peninsula residents for its visual attractiveness.
- Heavy traffic will continue on the existing road through Cooper Landing. Without improvements to the existing road accidents with environmental threats to the Kenai River will continue.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

- Do not add vehicular pullouts, interpretive signing or other attractions along this proposed bypass. I oppose all restrooms, trailheads and parking areas and bus pullouts along the preferred alternative. Trailheads to access the Resurrection Pass trail system are already in place along other routes in the area. Adding pullouts will cause additional negative environmental effects and scenic value damage, cigarette butts, trash and litter. Outhouses/restrooms/latrines along Alaska's road system are notorious for inadequate maintenance, human waste and toilet paper littering the ground. Most State of Alaska highway restroom are shuttered in the winter forcing travelers and their pets to urinate and defecate in the parking lots and doorways of the shuttered restroom. Do not add pullouts to this proposed bypass. Folks can use the existing trailheads to access the country.

RESPONSE: DOT&PF and FHWA worked with adjacent land managers and have agreed to provide pull-out parking where those managers need/desire it to support their land management objectives. The land

managers requested these pullouts and have agreed to maintain them.

- Underpasses are necessary. There must be an adequate crossings to reduce conflicts between humans, bears, and moose. I understand the number of wildlife passes have been reduce to save money. More wildlife passes are needed for this proposed road.

RESPONSE: Wildlife crossing structures have not been "reduced to save money." A wildlife mitigation study was performed, and study data have been incorporated into the locations proposed for establishing crossings along the alternatives. The purpose of the study is to place the crossings at locations where moose, bears, and other wildlife are most likely to cross. Fencing, or other designed features, to funnel wildlife to the designated crossing areas is anticipated as part of the crossing design.

- The proposed alternative must be treated as as a bypass and keep traffic moving through the area as that was one of the reasons of a bypass through Cooper Landing in the first place.

RESPONSE: As explained in Section 2.6.2 of the EIS, access to those segments of each alternative that would be built on a new alignment would be controlled and DOT&PF will not provide driveways. For the Juneau Creek alternatives, DOT&PF has agreed to reserve access for a potential connection using ramps to the rural residential development on State Management Unit 395. A connection would also be reserved for the CIRI Tract A development near the connection of the old and proposed highway segments under the Juneau Creek Alternative. The new highway is intended to serve the mobility of through traffic. By not allowing additional new access roads and driveways, DOT&PF can keep that portion of the new highway functioning at a high level, improve safety, and reduce congestion.

Thank you.
Bill Berkhahn
Soldotna, Alaska
907-262-5618

ID: 1447 **Source:** Email **Date Submitted:** 4/13/2018
Name: David C. Raskin, Ph.D. **Title:** President
Organization: Friends of Alaska National Wildlife Refuges

Please accept the attached comments on the Alaska DOT&PF, Sterling Highway MP 45-60 Project. Thank you.

David C. Raskin, Ph.D.
President
Friends of Alaska National Wildlife Refuges 59975 Eider Ave
Homer, AK 99603
907-235-0514
425-209-9009 mobile
davidcraskin@gmail.com

RESPONSE: Attached text is found at ID 1549.

ID: 1448 **Source:** Web **Date Submitted:** 4/13/2018
Name: Robert Gieringer
Organization:

I am glad to see this bypass coming to avoid the sharp turns and narrow roads through Cooper Landing with little shoulder room to avoid collisions with semi trucks. Also, avoiding speeders and dangerous passing on local roads in Cooper Landing by persons eager to get to more distant destinations. This allows persons with business or pleasure in the local area more freedom to exercise their activities.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

It is my hope that this will not in any case result in neglect of local road maintenance in the Cooper Landing area.

RESPONSE: DOT&PF is committed to operating and maintaining both roadways. However, priority will be given to the NHS route.

The sooner, the better that this project moves ahead is my opinion.

ID: 1450 **Source:** Email **Date Submitted:** 4/13/2018
Name: Lynnda Kahn
Organization: USFWS

Please disregard the 1st version I sent earlier as the general comments provided behind the cover letter, were not up-to-date.

Therefore, please use the attached comments. Thank you and sorry for any confusion.

Lynnda

RESPONSE: The second submittal was used as requested.

On Fri, Apr 13, 2018 at 4:52 PM, Kahn, Lynnda <lynnda_kahn@fws.gov> wrote:

> Hi John, please find attached, the USFWS comments on the Sterling Hwy MP
> 45-60 FEIS. Andy and I will both be out of the office next week so if
> there are any questions, you can either reach John Morton or Steve Miller,
> both copied here. Otherwise, I will be returning on Friday, April 20th and
> I believe Andy is back the following week. Thank you and hope you have a
> great weekend.
>
> *Lynnda*
>

> Lynnda Kahn | Fish & Wildlife Biologist
>
> Kenai National Wildlife Refuge
>
> P.O. Box 2139 | Soldotna, AK 99669
>
> *(907) 260-2818*
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RESPONSE: The attachment is found at ID 1539.

ID: 1451 **Source:** Web **Date Submitted:** 4/14/2018
Name: Ken Scott
Organization:

This seems the best option for a bypass, glad to see this finally moving forward, long overdue.

RESPONSE: Comment noted.

ID: 1452 **Source:** Web **Date Submitted:** 4/14/2018
Name: Gregory Sorenson
Organization:

I was the State of Alaska engineer for building MP 37-45 that was completed in 2001. I was also the engineer for Canyon Creek Bridge at the Hope Y. I have lived in Hope for 30+ years. My oldest son lives in Kenai and I drive to visit and get groceries many times a year both summer and winter. The Cooper Landing area has always been a tough drive and my wife Dru will not drive it if it is dark.

Working on the MP 37-45 I became a little familiar with local concerns about Cooper Landing being by-passed by the highway if were moved to the Juneau Creek alternative on the North side of the Kenai River. Concerns were mostly by Hamiltons and Gwens. I see Juneau Creek alternative as a positive for both the area and the State of Alaska. For residents of the State the advantage is obvious because the road will be safer and much faster. Another advantage of Juneau Creek is the sun will be on it longer creating better driving conditions. A simple thing like the bank of Canyon Creek bridge toward the south rather than the old bridge banking toward the north makes a lot of difference. I think routing the road to the north will also be better for Cooper Landing residents because they will not have to put up with the noise of traffic, especially truck traffic all night long. It would be so much more pleasant to walk along the road on the existing pedestrian path along the road if there were not the trucks and impatient drivers itching to get to Homer. It would be nice, if as a part of this project, if the DOT/PF would perhaps help Cooper Landing to become what it wants which is a tourist "destination" and moving the road would in my opinion be a step in the right direction. As a "destination" tourists would go "to" the business area and a simple thing like a bike/walking path along a small portion of the road would be helpful. It would be funner to "cruise" the highway in Cooper Landing and perhaps pull over rather than have a big truck in your rear

view mirror. As far as construction, building the new alignment of Juneau Creek would eliminate conflict between construction and traffic. The cost of managing traffic in construction is sometimes 20% of the cost let alone all the pain/suffering by the motorist. A load of fish going from Kenai to Seward, or someone delayed from getting home because they forgot their meds are real costs that construction brings. I hope the community of Cooper Landing fully supports the venture as it will change Cooper Landing for the better and create new opportunities. I still go down to the Sunrise Inn and stop by Wild Man's for a sandwich. Sometimes I drive up Bean Creek and a couple times a year I take my boat out on Kenai Lake.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1453 **Source:** Web **Date Submitted:** 4/14/2018
Name: Wallis Adams
Organization:

I would like to state for the record that I believe this project to be a waste of taxpayer money. For the approximate cost of $300 million dollars, this project will be alleviating traffic congestion in Cooper Landing for the months of June and July. The current speed limit through Cooper Landing is 35 mph. Are we as a society in such a hurry that we have to maintain a speed of 55-60 mph through what is arguably one of the most scenic drives in Alaska? Is slowing down and enjoying the drive one of the options for this project?

RESPONSE: The purpose of the project is to reduce congestion, bring the highway up to modern standards, and improve safety, not to speed up travel to Anchorage. DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources.

ID: 1454 **Source:** Web **Date Submitted:** 4/14/2018
Name: Amanda Daumiller
Organization:

Hello, MP 45-60 Planners!

I work at the Kenai Riverside Lodge on the Sterling HWY in Cooper Landing and live on the Sterling HWY just down the road from the lodge. I walk or bike from home to work as well as to other locations in town along the highway, along with many other full time, seasonal, ans visitng residents. The trip can be terrifying in the summer when the highway is crowded with tourists and truckers who rarely respect the 35 mph speed limit through town. There are a few spots where there is no designated or safe path for pedestrians, particularly crossing Cooper Creek, where there is no path or shoulder along the sides of the narrow and heavily trafficked bridge.

Because of the dangerousness and noisiness of living near the Sterling HWY, I am excited at the prospect of a bypass lightening the traffic load through Cooper Landing. I ask that, in planning the

construction of the bypass, you take into consideration the needs of Cooper Landing's pedestrians and bikers, as proposed by Walkable Cooper Landing. The area is becoming increasingly popular as a seasonal and tourist destination, and we badly need your support to remain safe.

Thank you for your consideration, and please feel free to contact me for further comment.

RESPONSE: DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway.

ID: 1455 **Source:** Web **Date Submitted:** 4/14/2018
Name: Tom Pence
Organization: Alaska Wildland Adventures

Hello,

My name is Tom Pence and I am in support of the walkable community of Cooper Landing, Alaska. I have spent the last 5 summers in Cooper Landing and having a safe walking path is imperative for those who live here year-round and those spending the summer months in town. Many of us who are here for the summer do not have vehicles but still want to explore the wonders of the local ecosystems and the walking paths are the main routes that can bring us to the beautiful scenery. Being an avid runner myself, a safe and accessible path is important for maintaining and expanding my running schedule and the path in Cooper Landing is my favorite location to run. We also have to consider the benefits for the local ecosystems and atmosphere where a safe and well maintained walking path exists. With a good path the locals are encouraged to walk, bicycle, or run, encouraging good health and leaving behind our fueled modes of transportation. This, of course, keeps less emissions in the air and less opportunities to spread oils and fuel into our rivers and other natural locations, keeping our wildlife healthy. With less vehicles on the roads we are given a greater opportunity to mitigate auto accidents in our busy neighborhoods. Less vehicles means less opportunities for collisions. And with less vehicles on the roads we can also consider the extra peace we are giving our animal neighbors. This can lessen the chance of animals becoming complacent towards the sounds of machines, allowing them to be more alert to the sounds of humanity. Some may argue how this might increase the amount of animals on the road but I believe keeping our sounds strange will be a good aversion to moose and bear.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

Thank you for taking the time to listen to my concerns about the walkable community of Cooper Landing. This subject is very important to me on a personal level and I hope that we can not only maintain our walkways but increase their safety and structure for all of those who wish to visit Cooper Landing or, as I do, call it home.

Thank you again!

Tom Pence

ID: 1456 **Source:** Web **Date Submitted:** 4/14/2018
Name: Jon James
Organization: Jon James Construction LLC

As a 27 year full time resident of Cooper Landing I applaud the selection of the Juneau Creek Alternative. Hopefully this divisive community issue will finally move forward. I feel the community, businesses, including my business will thrive with better land planning, improved safety, less truck traffic passing through the center of town. This alternative will also serve the lower peninsula well into the future. The Kenai River which is critical to all who live in Cooper Landing will be better protected.

One important point that the community could agree on through the years has been that no access (entrance/exits) would be granted to any bypass alternative to help protect the core of the community from moving.

RESPONSE: As explained in Section 2.6.2 of the EIS, access to those segments of each alternative that would be built on a new alignment would be controlled, and DOT&PF will not provide driveways. For the Juneau Creek Alternative, DOT&PF has agreed to reserve access for a potential connection using ramps to the rural residential development on State Management Unit 395. A connection would also be reserved for the CIRI Tract A development near the connection of the old and proposed highway segments under the Juneau Creek Alternative. The new highway is intended to serve the mobility of through traffic. By not allowing additional new access roads and driveways, DOT&PF can keep that portion of the new highway functioning at a high level, improve safety, and reduce congestion. By not permitting driveway access, DOT&PF can also avoid inducing commercial development and sprawl. The pullouts and trailheads proposed in each alternative are to provide access where alternative access does not already exist and are part of negotiated mitigation for effects to recreational resources.

Sincerely,
Jon James

ID: 1457 **Source:** Email **Date Submitted:** 4/14/2018
Name: Peter Hansen
Organization:

Gentlemen;

I am a long term (50 + years) Boy Scout of America youth leader living in the City of Kenai. This Northern

Route of rerouting the highway thru Cooper Landing area will provide the safest means of transporting BSA youth leaders and youth to the Boy Scout Camps which are all located in the Greater Anchorage Area north of the Kenai Peninsula. Not only the safest, but also the most efficient timewise.

Additionally, this rerouting provides the same for the weekly Scout Executives and leaders who drive south to the Western Peninsula from Anchorage, for administering training of Scout volunteers living on the Peninsula.

Furthermore, the monthly and sometimes weekly travel of leaders and youth between Seward on the eastern Kenai Peninsula, and towns & cities on the western Peninsula will be much safer and less time consuming.

- Additionally: The many commercial semi-trucks, often pulling another trailer or two behind them, will provide a great degree of safety using the Northern route without curves, and without exposure to the occasional dumping of cargo into the Kenai River which affects the salmon habitat.
- * The Northern Route will also expose a fabulous opportunity for people of all ages to enjoy Juneau Falls and the surrounding wilderness habitat which has never been heretofore easily accessible by the majority of our nation's people.

Please move forward with this Project.

Sincerely,

Peter O. Hansen, M. D.
Boy Scout Leader and Great Alaska Council Board Member
P. O. Box 1390
Kenai, Alaska 99611
Home Phone: 907-283-4615

Cell Phone: 509-680-2179

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1458 **Source:** Email **Date Submitted:** 4/14/2018
Name: Candy FitzPatrick
Organization:

Hello Sterling Highway MP 45-60 Project Planners and Involved Organizations,

My name is Candy FitzPatrick and I became a resident of Cooper Landing along with my husband in 2009. While I haven't been a part of the community discussion regarding the Sterling Highway reroute for as long as quite a few community members (over 35 years!), I do have some concerns regarding the preferred Juneau Creek Alternative route. My chief concerns are for the property owners in the direct path of the proposed highway "intersection" near mile post 47 on the north side of the current highway, concerns about the speed limit along the distance of the existing highway from mile post 45 to 46.5 and

the intersection that will be arriving with the reroute, and concerns with the walkability of our little town.

First, the property owners near mile post 47 are going to be greatly affected by the highway reroute because their little slice of heaven will then be sandwiched between a highway ramp and intersection, a new highway with a higher speed limit, and the current Sterling Highway route. If you bought property in Cooper Landing for its location in a mountainous area with a gorgeous view and made your home there, only to find out you drew the short straw, how would you feel about that? I do hope that when the time comes, the designers and engineers talk to those people affected (the Donahue's, etc) and walk their land with them to get a feel for what is being taken away from them. Please work with them on a solution that will BENEFIT THEM.

RESPONSE: During subsequent phases, DOT&PF right-of-way agents will be available to discuss right-of-way needs and remedies. Should right-of-way be needed or access reconfigured, the right-of-way agents will be in touch with property owners. Property acquisition will be in accordance with the Uniform Relocation Act.

Second, the speed limit from the Seward/Sterling highway wye to just before mile post 45 (near Quartz Creek Road) is 55 mph. It slows to 45 mph for the curves and then down to 35 mph about two miles later near the Kingfisher restaurant. Since the preferred alternative route doesn't turn off the current route until around milepost 46.5, that means that there will be about 1.5 miles where traffic will need to slow from 55 mph to 45 mph until the new ramp/intersection and then back to 55 mph? I think it is crazy to think that those drivers who can't seem to ever drive the speed limit driving through Cooper Landing now will slow down for those curves. Crazy! There is potential for a much greater risk in accidents in that 1.5 mile stretch because people will not slow down. And now there will be an intersection there with its inevitable congestion. Add to this the potential problems that will occur for emergency vehicles and semi-trucks.

Ugh, it just seems like the worst possible place for the turnoff/ramp/intersection.

RESPONSE: The Sterling Highway alignment will be designed to be a uniform 55 miles per hour (mph) throughout. The current 35 mph curve will be flattened and the sight distance improved to allow a safe 55 mph speed. The old highway speed limit as it approaches the intersection with the new highway will be tapered down through signage and design to alert drivers on the old highway of the approaching intersection. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway. The segment of existing Sterling Highway left under any of the alternatives would no longer be part of the NHS, and would be reclassified to a lower functional classification, likely as minor arterial or major collector. That means the road would provide less of a statewide function and would be intended to serve more localized trips, characterized by slower speeds that are safer for accessing adjacent properties. Removing through-traffic drivers from the "old" highway could leave the "old" highway a candidate for a lower speed limit. DOT&PF has committed to a speed study on the old highway to readjust the speed after the new alignment is built.

Third, the walkability (to include bike-rideability and strollerability) of Cooper Landing. We have a committee/work group that addresses the Walkable Cooper Landing needs. They work diligently in trying to make our community more walkable by raising funds, planning, and implementing needed improvements and construction of usable paths. There is a Cooper Landing Walkable Community Project Plan that I hope you all have been able to look over.

RESPONSE: DOT&PF and FHWA are in receipt of many letters regarding the Cooper Landing Walkable Community Project Plan. See responses under ID 1402, 1409, and/or 1412.

I really don't understand why the Snow River Bridge pedestrian walkway was selected by the Forest Service to replace the Resurrection Pass Trail section that will be altered by the new highway. The Snow River Bridge is in a different community, on a different highway, along a different historic trail, and there are places within Cooper Landing that could use the walkway funds instead. Would it be possible to revisit this decision again? I believe the decision regarding this "trade off" was made at least 15 years ago. Constructing trail segments that connect Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

RESPONSE: The proposed mitigation is specific to the Resurrection Pass Trail and was proposed and coordinated with the Forest Service as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation to local community trails.

Because I know that the walkable community issues are a primary concern for both the Cooper Landing Walkable Community Project (and their Plan) and the Cooper Landing Advisory Planning Commission and that those organizations (and many community members) have written letters to you all, I will not repeat the same very important information they are providing. Instead, I will plead with you all to meet with them and read their plans because they represent all of the residents (myself included), part-time residents, businesses, and visitors (our prime money maker).

In the future, there is a possibility that this reroute might eventually become something good for Cooper Landing as well as highway users from everywhere. Taking all of the considerations and the community involvement to heart by your committees, planners, engineers, and designers will go a long way for the popularity of this project. Thank you for reading my comments.

Good luck!

Candy FitzPatrick

ID: 1459 **Source:** Web **Date Submitted:** 4/14/2018
Name: Candy FitzPatrick
Organization:

RESPONSE: This comment is a duplicate of ID 1458. See ID 1458 for responses.

Hello Sterling Highway MP 45-60 Project Planners and Involved Organizations,

My name is Candy FitzPatrick and I became a resident of Cooper Landing along with my husband in 2009. While I haven't been a part of the community discussion regarding the Sterling Highway reroute for as long as quite a few community members (over 35 years!), I do have some concerns regarding the preferred Juneau Creek Alternative route. My chief concerns are for the property owners in the direct path of the proposed highway "intersection" near mile post 47 on the north side of the current highway, concerns about the speed limit along the distance of the existing highway from mile post 45 to 46.5 and the intersection that will be arriving with the reroute, and concerns with the walkability of our little town.

First, the property owners near mile post 47 are going to be greatly affected by the highway reroute because their little slice of heaven will then be sandwiched between a highway ramp and intersection, a new highway with a higher speed limit, and the current Sterling Highway route. If you bought property in Cooper Landing for its location in a mountainous area with a gorgeous view and made your home there, only to find out you drew the short straw, how would you feel about that? I do hope that when the time comes, the designers and engineers talk to those people affected (the Donahue's, etc) and walk their land with them to get a feel for what is being taken away from them. Please work with them on a solution that will BENEFIT THEM.

Second, the speed limit from the Seward/Sterling highway wye to just before mile post 45 (near Quartz Creek Road) is 55 mph. It slows to 45 mph for the curves and then down to 35 mph about two miles later near the Kingfisher restaurant. Since the preferred alternative route doesn't turn off the current route until around milepost 46.5, that means that there will be about 1.5 miles where traffic will need to slow from 55 mph to 45 mph until the new ramp/intersection and then back to 55 mph? I think it is crazy to think that those drivers who can't seem to ever drive the speed limit driving through Cooper Landing now will slow down for those curves. Crazy! There is potential for a much greater risk in accidents in that 1.5 mile stretch because people will not slow down. And now there will be an intersection there with its inevitable congestion. Add to this the potential problems that will occur for emergency vehicles and semi-trucks.

Ugh, it just seems like the worst possible place for the turnoff/ramp/intersection.

Third, the walkability (to include bike-rideability and strollerability) of Cooper Landing. We have a committee/work group that addresses the Walkable Cooper Landing needs. They work diligently in trying to make our community more walkable by raising funds, planning, and implementing needed improvements and construction of usable paths. There is a Cooper Landing Walkable Community Project Plan that I hope you all have been able to look over.

I really don't understand why the Snow River Bridge pedestrian walkway was selected by the Forest Service to replace the Resurrection Pass Trail section that will be altered by the new highway. The Snow River Bridge is in a different community, on a different highway, along a different historic trail, and there are places within Cooper Landing that could use the walkway funds instead. Would it be possible to revisit this decision again? I believe the decision regarding this "trade off" was made at least 15 years ago. Constructing trail segments that connect Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Because I know that the walkable community issues are a primary concern for both the Cooper Landing Walkable Community Project (and their Plan) and the Cooper Landing Advisory Planning Commission and that those organizations (and many community members) have written letters to you all, I will not repeat the same very important information they are providing. Instead, I will plead with you all to meet with them and read their plans because they represent all of the residents (myself included), part-time residents, businesses, and visitors (our prime money maker).

In the future, there is a possibility that this reroute might eventually become something good for Cooper Landing as well as highway users from everywhere. Taking all of the considerations and the community involvement to heart by your committees, planners, engineers, and designers will go a long way for the popularity of this project.
Thank you for reading my comments.

Good luck!
Candy FitzPatrick

PS: The attached file is the same as the comments in this box.

ID: 1460 **Source:** Web **Date Submitted:** 4/15/2018
Name: Karl Romig
Organization:

This project lacks subsitive mitigation and improvements to existing infrastructure and effected areas.

RESPONSE: Mitigation commitments are summarized in the ROD and total to more than 35 pages. These commitments have been estimated to cost more than $15 million for the mitigation associated with wildlife, wetlands, and cultural resources.

More specifically is a list of my concerns.

1. The safety path along the north side of sterling Hwy from MP 45 to 50 is completely ignored and must be improved to current standards. The pathway is a viable nessesty to facilitate bikers and walkers safely through the river corridor.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

2. In addition to comment #1 the sterling Hwy MP (45 to 54) must be developed to safely manage the traffic. With the design of turning lanes, mediums and other traffic control methods this can easily be accomplished with existing right of way. This project is not complete without such improvements and shirks the professional responsibilities of all the designers and engineers that have worked on this project for decades.

RESPONSE: The designs in the Final EIS have been developed to a 30 percent design level by professional engineers licensed in the State of Alaska using nationally accepted design standards to safely manage traffic. The EIS does evaluate an alternative, the 3R Alternative, which considers a partial improvement analysis of the existing route that attempts to stay within the existing right-of-way. It was studied in both the Draft EIS, and additional analysis was conducted for the Final EIS (see Chapter 2). This alternative was considered but rejected because it did not satisfy the purpose and need for the

project and was not technically feasible from an engineering perspective.

3. There is no subsitive Contingency plan to address hazardous materials that may devastate the Kenia River corridor. Protecting the Kenai River watershed is and has been a convenient excuse to keep this project moving forward but yet the this issue is ignored.

DIverting some traffic around which this project does, does not eliminate this critical issue of protecting the Kenai River watershed in any manner what so ever.

A contegency program with funding mechanisms must be developed that includes trained personnel that can respond to accidents quickly in such a manner to protect the River. Equipment and materials to be used in such an event must be easily assisable in a facility. Again, talk is cheap as we found out in the Exxon Valdez disaster in 1989 .

A good example of this type of contegency response team would be something like "Cook Inlet Keepers" which was born from the Exxon Valdez disaster.

RESPONSE: Concern about spills in the Kenai River was a key decision factor in selecting the Juneau Creek Alternative. The purpose of the project is not to eliminate the risk of spills in the Kenai River. The purpose and need for the project is to reduce congestion, bring the highway up to current standards, and improve safety. Compared to the other build alternatives, the Juneau Creek Alternative performs the best on measurable purpose and need criteria. The data bear out that the Juneau Creek alignment will substantially reduce the risk of crashes, including truck crashes; has considerably less of its alignment in proximity to the Kenai River and other Tier 1 streams (reducing the potential that should a spill occur it would reach the steam or river system); and allows more time to respond, compared to other alternatives, should a spill reach a stream.

The final EIS included a new crash analysis report (Appendix A) that documents predicted crashes in 2043 based on the Highway Safety Manual Predictive Method procedures. Compared to the No Build Alterative, the Juneau Creek Alternative has substantive safety benefits for both NHS traffic and the traffic on the old highway. The analysis predicts a 69.7 percent reduction in crashes on intersections and segments on the Juneau Creek Alternative as compared to the No Build Alternative. When considering crashes on both the old and new highways as a system, building the Juneau Creek Alternative results in a 48.9 percent decrease in crashes on the system overall as compared to doing nothing.

Moreover, the analysis suggests the crashes will not be as severe. The crash analysis indicates that 10.9 fatal and injury crashes per year would occur in 2043 under the No Build Alternative, while 3.3 are predicted under the Juneau Creek Alternative.

In conclusion; quite simply this project is not complete in the planning stage without addressing the above concerns. As the project stands now it only exacerbates environmental and social economic problems.

Please consider my comments as constructive criticism and institute real solutions.

Karl Romig, 4-15-18

ID: 1461 **Source:** Web **Date Submitted:** 4/15/2018
Name: Weston Williams
Organization:

I am a part-time resident of Cooper Landing. I feel it is imperative that the ADOT&PF keep the Juneau Creek Alternative as the preferred alternative. This is the obvious and correct decision. Thank you. The sooner this is completed, the better.

RESPONSE: Comment noted.

ID: 1462 **Source:** Web **Date Submitted:** 4/15/2018
Name: Charles Williams
Organization:

I am a part-time resident of Cooper Landing. Please keep the Juneau Creek Alternative as the preferred alternative. This is the obvious and correct decision. Thank you. The sooner this is completed, the better.

RESPONSE: Comment noted.

ID: 1463 **Source:** Web **Date Submitted:** 4/15/2018
Name: Samara Williams
Organization:

I am a part-time resident of Cooper Landing. I feel it is imperative that the ADOT&PF keep the Juneau Creek Alternative as the preferred alternative. This is the obvious and correct decision. Thank you. The sooner this is completed, the better.

RESPONSE: Comment noted.

ID: 1464 **Source:** Web **Date Submitted:** 4/15/2018
Name: Margaret Nelson
Organization:

I am anxious that the state move forward and complete this project. You have done a good job on the study and it's time to get this project under construction. I'm in favor of the state proceeding with this route.

RESPONSE: Comment noted.

ID: 1465 **Source:** Web **Date Submitted:** 4/15/2018
Name: Calvin Williams
Organization:

I am a part-time resident of Cooper Landing. Please keep the Juneau Creek Alternative as the preferred alternative. This is the obvious and correct decision. Thank you. The sooner this is completed, the better.

RESPONSE: Comment noted.

ID: 1466 **Source:** Web **Date Submitted:** 4/15/2018
Name: Evan Williams
Organization:

I am a part-time resident of Cooper Landing. I feel it is imperative that the ADOT&PF keep the Juneau Creek Alternative as the preferred alternative. This is the obvious and correct decision. Thank you. The sooner this is completed, the better.

RESPONSE: Comment noted.

ID: 1468 **Source:** Email **Date Submitted:** 4/15/2018
Name: Sandra Holsten
Organization:

This project has so many environmental, economic and social impacts that have been commented on and dismissed that I will focus only on the most glaring section. That is the mitigation section. Why is mitigation for impacts on Cooper Landing a bridge over Snow River. Moose Pass will only favorably impacted by this project when many will opt to avoid Cooper Landing business because of construction. For years this was call “The Cooper Landing ByPass Project” not the Moose Pass By Pass.

Businesses and recreation and wildlife will be impacted in Cooper Landing not Moose Pass.
This represents a serious lack of understand by US Forest Service personnel of the communities they surround. It also shows lack of due diligence on the part of DOT and FHWA. Both agencies know that Cooper Landing has active civic, business, recreation and environmental groups and individuals who are capable and were willing to assist in identifying appropriate mitigation in the area affected by the project.

Sandra Holsten
38361 Snug Harbor Road
PO Box 790
Cooper Landing, AK
99572 907-595-2097
PS. Your email does not work from your public notice

RESPONSE: The proposed mitigation is specific to the Resurrection Pass Trail and was proposed and coordinated with the Forest Service as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation to local community trails.

ID: 1470 **Source:** Web **Date Submitted:** 4/15/2018
Name: Heather Harrison
Organization: Cooper Landing School Site Council

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Letter also attached as a document.

Cooper Landing School Site Council/Parent Advisory Committee
19030 Bean Creek Road
Cooper Landing, AK 99572

Attached text follows:

April 11, 2018

Brian Elliott,
Environmental Manager
DOT&PF Central Region
Sterling Highway MP 45-60 Project
PO Box 196900
Anchorage, AK 99519-6900

Dear Mr. Elliott:

We are writing to you on behalf of the Cooper Landing School Site Council and Parent Advisory Committee. We wish to express our thoughts in response to the Final Environmental Impact Statement for the Sterling Highway MP 45-60 Project. We would appreciate your consideration of the points below, as they will directly affect the safety of students, parents, staff, and visitors, as they travel to and from our school.

- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for intense periods of use. Both ends need better plans for integrating local access and reducing the inevitable congestion.
- The Safety Path running along the Sterling Highway, between MP 45 and 50, was created in 1993 to provide a safer means of pedestrian travel within the community. It is the only way for students and staff to safely walk or bicycle to school. Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe

crossing at that point or any other for bike/pedestrian traffic. Failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road. We feel that failing to provide this crossing would be negligent.
- This project's impacts on our community outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the safety issues created by the Bypass Project. This should be the minimum level of mitigation for the extensive recreational and economic impacts upon the Cooper Landing community by this project.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
- Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
    - Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Thank you for the opportunity to express the interests of Cooper Landing School regarding the Sterling Highway MP 45-60 Project. We will be impacted greatly by this project and hope that you will address these concerns raised by our community.

Sincerely,

Heather Harrison
Cooper Landing Site Council/Parent Advisory Committee President

CC:
Chugach National Forest Supervisor's Office
Attn: Forest Supervisor Terri Marceron

161 East 1st Ave., Door 8
Anchorage, AK 99501
mailroom_r10_chugach@fs.fed.us

Kenai National Wildlife Refuge
Attn: Refuge Manager Andy Loranger
P.O. Box 2139
1 Ski Hill Rd.
Soldotna, Alaska 99669-2139
kenai@fws.gov

Kenai Peninsula Borough
Attn: Charlie Pierce, Mayor
144 North Binkley St.
Soldotna, AK 99669
cpierce@kpb.us

ID: 1471 **Source:** Web **Date Submitted:** 4/15/2018
Name: Katie Thomas
Organization: Cooper Landing Community Library

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Final Environmental Impact Statement Response

Our organization's concerns listed below:

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project

Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.
- It cannot be overstated that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
        - Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
    - Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

ID: 1472 **Source:** Web **Date Submitted:** 4/15/2018
Name: Grace Harcz
Organization: Alaska Wildland Adventures

Hey, All! I'm glad the issue with the Sterling Highway is being addressed. I've been a guide in the area for a few summers and the road makes the community difficult and unsafe to access by foot or bike. The road is tight, the traffic is heavy and there are no shoulders. The path along the North side of the road a single track and not adequate for getting around. It doesn't make sense to put all this money, time and effort into a new road that also doesn't support pedestrian travel? I feel that the small community comes off as busy and intimidating. There are hundreds of miles of trails around, but if someone doesn't have a car, it's dangerous to get to. A lot of the people I work with never leave camp because of the transportation issue and therefore have a harder time exploring the area. I hope the changes proposed in the letter supporting a walkable Cooper Landing are incorporated into the construction of the project. I think it will breath some freshness back into the community. Thank you for your time.

RESPONSE: See responses under ID 1402, 1409, and/or 1412 for responses.

ID: 1473 **Source:** Email **Date Submitted:** 4/15/2018
Name: Heather Pearson
Organization: Kenai Float-n-Fish

Hello,

Please find attachment addressed to:

Brian Elliott,
Environmental Manager
DOT&PF Central Region
Sterling Highway MP 45-60 Project

This is public comment on the project Final Environmental Impact Statement.

CC: USFS, KNWR, KPB

Warm regards,
Heather Pearson
Kenai River Float-n-Fish
(907) 595-3505 | www.mightykenai.com
Follow us: @mightykenai

RESPONSE: This comment attachment is found at ID 1510.

ID: 1474 **Source:** Web **Date Submitted:** 4/15/2018
Name: Virginia Morgan
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

At one of the recent meetings on this project, the meeting organizers asked for some history on the Safety Path along the highway in Cooper Landing. The following link provides that history: http://www.walkcooperlanding.org/historical-timeline/

I have the following concerns:

- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.
- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

Thank you.

ID: 1475 **Source:** Web **Date Submitted:** 4/15/2018
Name: Thomas Gossard
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

My top three concerns are:

-the proposed entry and exits from Sterling Hwy onto the proposed new Bypass
-continued maintenance of the current Sterling Hwy in Cooper Landing
-Safety Path crossing at beginning of bypass and at Quartz Creek Road must be addressed. I use the Safety Path daily.

Concerns listed below with more specificity:

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- The Safety Path along the highway, between MP 45 and 50, was created in 1993 to provide a safer means of pedestrian travel within the community. Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing

would be negligence.

- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.
- It cannot be overstated that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
        - Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
    - Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

ID: 1476 **Source:** Web **Date Submitted:** 4/15/2018
Name: Mitchell Michaud
Organization:

Westerly traffic congestion in Soldotna. I agree that the project will greatly decrease the threat of a catastrophic spill event and congestion in Cooper Land. The current widening project from East Skilak road to Sterling will also improve traffic safety. Combine these improvemenst in traffic flow will lead to congestion at the constriction point located just outside of Soldotna. Already left turns on to the highway are difficult during morning commutes and during the summer fishing season almost impossible without agressive driving. I am anticipating that summer traffic and fishing season will cause increase congestion at the Big Johns truck stope and the Linden trucking area which is already a high traffic accident area as

well as the area just east of the Fred Meyer store in Soldotna. This is where there already is raffic backing up almost a mile behind the traffic light in soldotna. Resulting in Kenai bound traffic seeking a bypass route to avoid this congestion. I happen to live in the neighborhood that is accessed by this current bypass which is a "Pioneer" road 6 inches of gravel over parent material. This was mentioned at the past public hearing in Soldotna. It was addressed as a non issue since the bypass is solving a present and a future congestion issue will be addressed at a later time. I challenge DOT and Federal Highway to include in their analysis the cumulative- off site effects of westerly congestion. Again I fully support the by-pass but I desire the acknowledgement of a future concern and the possibility having to address these impacts shortly after construction is completed.

RESPONSE: As traffic grows on the Sterling Highway, traffic congestion will inevitably occur. Fixing traffic congestion problems through Cooper Landing will not create a situation of just moving a bottleneck farther down the highway. The traffic flow restriction through Cooper Landing is independent from the issues being experienced more than 50 miles away in Soldotna.

ID: 1477 **Source:** Email **Date Submitted:** 4/15/2018
Name: Mike Adams
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

To whom it may concern;

As a resident of Cooper Landing I am writing to voice the following concerns about the preferred Sterling Hwy bypass alternative.

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project’s impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing “Safety Path” with the established components of the Cooper Landing Walkable Community Project’s Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60

Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.
- It cannot be overstated that there should not be *any* driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
        - Mitigation applied to the Snow River bridges creates a connection to a *different* long-distance trail in the National Trails System *in a different community* than the one affected by the project but does not adequately address the affected trail or community.
    - Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Finally, noise and visual barriers should be implemented to reduce the visual effect of a new highway on the community and to reduce the impact of the heavy jake brake use that is certain to occur. Signage

prohibiting the use of engine brakes and enforcement of such regulation should also be implemented.

Thank you for your consideration of these community concerns.

Sincerely,
Mike Adams
PO Box 847
Cooper Landing, AK 99572
907-595-3336

ID: 1478 **Source:** Web **Date Submitted:** 4/15/2018
Name: Chris Cravens
Organization:

The costs and environmental impacts associated with this project and the particular "route" that is currently preferred are much too high at this time. If the current highway section was going to be completely "replaced" it may make more sense. The state will still have a costly obligation to maintain the current section of road in addition to the contingency costs of the new one. Despite are large amount of federal money being used the state of Alaska cannot afford even the "10%" portion of this project. I suggest we utilize the "no action" alternative for now. We simply cannot currently afford this.

RESPONSE: DOT&PF and FHWA are aware of the increased maintenance burden and have disclosed this in Section 3.5 of the Final EIS. The programming of projects, including this one, goes through a rigorous statewide evaluation and ranking process, which is ultimately approved by the DOT&PF Commissioner and FHWA. This project will be funded by approximately 90 percent federal funds and will be phased in over time. The *Initial Financial Plan* is included in the Final EIS (Appendix H) and provides additional details regarding how the project is proposed to be funded.

ID: 1479 **Source:** Web **Date Submitted:** 4/16/2018
Name: Martha Story
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Martha Story and I support a Walkable Cooper Landing. I use the safety path that is already place to ride my bike to town or to jog. Many people in this community use the trail to get mail, go to the grocery store, to exercise, or to get their kids out for a walk. Each summer, Cooper Landing hosts many seasonal workers and tourists. I see this as a perfect opportunity to boost the walkability of town to make it more friendly for seasonal workers and tourists alike.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the “Safety Path” to promote and celebrate the use this pathway provides the community on a daily basis

year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway

right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
Martha Story

ID: 1480 **Source:** Web **Date Submitted:** 4/16/2018
Name: Cooper Landing Walkable Community
Organization: Cooper Landing Walkable Community

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades.

The citizens of Cooper Landing have been fighting for safe pedestrian access along the Sterling Highway Corridor for even longer than the bypass project has been under consideration.

The community has continually stated the importance of improvements to pedestrian and bicycle access. Whether through community votes to prioritize it for STIP funding, through including it in our land use planning and working for its inclusion in the Kenai Peninsula Borough's comprehensive planning, we work hard to ensure the need for pedestrian and bicycle access is known and recognized by all levels of government and planning agencies. We developed the Walkable Community Project in 2010 to provide a plan for making these improvements. We hold a trail run annually along the “Safety Path” to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Alaska Legislature has funded our Safety Path several times including, most recently, in 2012 when the state budget allocated $550,000 to upgrade the pathway. This was used to bring the bridge over the Kenai River and its approaches up to standard.

Our Safety Path is a known part of our community. We support this path. We walk and bike this path. It is our path and the path of our visitors. It is the connection to our lands, to our community, and to each other.

Despite this, Cooper Landing residents have been perpetually placed in a state of waiting. No decisions can be made regarding road improvements until a record of decision is made regarding the bypass project. Waivers have continually been issued to avoid bringing the existing roadway up to federal highway standards or to integrate facilities for pedestrian and bicycle access that even meet the minimum requirements for inclusion of these facilities with the excuse of indecision about the bypass.

This section of highway and, even more so, our Safety Path has been the perpetual can kicked down the road. This can, like every pedestrian walking through Cooper Landing is now forced into the highway.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve the community's ability to safely travel between public lands and facilities, home, school, work, community activities, or recreational opportunities by foot or bicycle.

Project planners must recognize the established existing and significant potential for future use by pedestrian and bicycle and its importance to the health and economic well being of our community. They must recognize the stunting of the community's connecting corridor caused by the prolonged indecision regarding the bypass project. They must recognize the need for meaningful action to mitigate for the project's effects. They must recognize the importance of using the presence of such a significant project to help make Cooper Landing a walkable community by reevaluating the following considerations:

The impacts of the Sterling Hwy. MP 45-60 project on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing “Safety Path” by implementing the components of the Cooper Landing Walkable Community Project’s Plan (such as, but not limited to, rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46 where the path leaves the existing Our Point of View roadway. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and we feel that failing to provide this crossing is negligent.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the

National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

Although the project planning assumes that noise and visual effects will remain within the threshold normally experienced by highway projects that do not require mitigation measures to be applied - this project is passing through an area that has not had highway speed traffic on it previously. The federal highway designation has effectively been in name only since traffic speeds have been limited to 35 and 45 mph up until this point. The noise and visual impacts will be pronounced and even more so considering the lifeblood of the community is the serene and natural qualities of the valley surrounding the headwaters of the Kenai River. All measures taken to mitigate the effects of this project must place special effort on preserving the unique qualities of wild Alaska that surrounds this area.

Thank you for taking these comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to the natural surroundings, the established and needed pedestrian and non-motorized facilities, or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,

The Cooper Landing Walkable Community Committee

ID: 1481 **Source:** Web **Date Submitted:** 4/16/2018
Name: Mike Davidson
Organization:

I support the "No Build" alternative as outlined in the draft EIS. The current preferred alternative (Juneau Creek Alternative) will cause significant impacts to the recreational use trails of Resurrection Pass as well as the Bean Creek Trail. Both of these are historical and heavily used recreational trail systems and both will suffer significant consequences and damage to their character should the preferred alternative be selected. The best option is the "No Build" option which would allow for continued enjoyment of these historical features as well as allievate the State of Alaska from maintaining two separate road systems in

the Cooper Landing area.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1483 **Source:** Web **Date Submitted:** 4/16/2018
Name: Alison Rein
Organization:

The existing safety path, located between Wildmans and Sunrise inn will be obliterated when this project is constructed. It doesn't seem to be known about, I couldn't find this important safety feature for pedestrians and non-hwy vehicles mentioned anywhere in the EIS. Mitigation for removing this trail needs to be included as part of this road construction project, and a safe pedestrian pathway needs to be included so pedestrians can safely travel between Wildmans and the Quartz creek neighborhood.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

I also read that there would not be a winter trailhead for Res Pass Trail on the new highway ..... STUPID short-sighted decisions with horrible safety consequences when the shoulders get lined with trucks & trailers and machiners are all over the traffic lanes.

RESPONSE: DOT&PF and FHWA worked with adjacent land managers and have agreed to provide trailhead parking where those managers need/desire it to support their land management objectives. The land managers requested these trailheads and have agreed to maintain them. The decision of whether to maintain the trailheads in winter will be up to the land managing agencies.

Please include a separated path for pedestrians so people living in the snug harbor and west areas of Cooper landing can safely travel to Quartz creek friends without using a motorized steet-legal vehicle.

ID: 1484 **Source:** Email **Date Submitted:** 4/16/2018
Name: KEE Construction, LLC
Organization:

We support The Juneau Creek Alternative, Period. Thanks, Ed & Kathleen Martin
KEE Construction, LLC

RESPONSE: Comment noted.

ID: 1485 **Source:** Email **Date Submitted:** 4/16/2018
Name: Charles Pinckney **Title:** State Planner/ANILCA Program
Organization: Alaska DNR - DML&W

-------- Original message --------
From: "Pinckney, Charles A (DNR)"
<charles.pinckney@alaska.gov<mailto:charles.pinckney@alaska.gov>>
Date: 4/16/18 7:09 AM (GMT-09:00)
To: "Summers, Kelly L (DOT)" <kelly.summers@alaska.gov<mailto:kelly.summers@alaska.gov>>
Subject: RE: Reminder: FEIS Comments are due Monday, April 16

Kelly,

DNR does not have further comments on what we have previously submitted.

RESPONSE: Comment noted.

Thank you,
Charles Pinckney
Resource Assessment & Development/ANILCA Program Coordinator
Alaska Department of Natural Resources
Division of Mining, Land & Water
550 W. 7th Ave. Suite 1050
Anchorage, AK 99501-3579
907-334-2551
907-269-8915 (Fax)
charles.pinckney@alaska.gov

ID: 1486 **Source:** Web **Date Submitted:** 4/16/2018
Name: Mitchel Dickinson
Organization:

There needs to be some assurance that proper sound abatement walls/techniques will be used where the new alignment comes along peoples homes which has not been acknowledged so far. Also there needs

to be some understanding and accommodation of the fact that overnight parking is a constant need throughout the year as people accessing the Juneau Creek cabins and or the general area park and go into the woods and stay a couple days. The parking lot should be able to accommodate trucks with snow machine trailers and a bathroom to accommodate the level of current use that this area gets.

RESPONSE: A noise study was prepared for this project and has been updated for the Final EIS. It included sound measurements in the project area and modeling of sound levels for dozens of homes, community facilities, campgrounds and other recreation sites, and dispersed and Wilderness recreation areas. Noise is addressed in Section 3.15 of the EIS. Although relatively few locations were determined to have Traffic Noise Impact substantial enough to consider noise mitigation, some were. It was not possible to find a suitable mitigation method given the configuration of driveways, which would create openings in noise barriers.

The Forest Service will manage the new trailhead accessing the Resurrection Trail. They have indicated that it would be managed for all user groups, including those visitors who would be staying overnight along the trail system. Camping at the trailhead itself would be prohibited, but visitors would be able to leave their cars at the trailhead overnight while using the trail system. This parking lot is planned to accommodate tour buses and large vehicles with trailers. Indications by the Forest Service are that it will not be maintained in the winter.

ID: 1487 **Source:** Email **Date Submitted:** 4/16/2018
Name: Peggy Mullen
Organization:

The proposed 10 miles of new construction north of Kenai Lake and Cooper Landing will be particularly hard on wildlife. It will open up backcountry to more hunting and trapping (for which it has garnered support from those groups and their senator). Building a major highway to accommodate two months of traffic makes no sense to me.

If we were in Vermont we would simply settle in for a scenic drive. It seems that leaving the 3 mile? area from mile 45 to the existing bridge with resurfacing and slightly wider shoulders for bicyclists would have the least impact on the wildlife of the area. (Many of the driveways are used only seasonally).The Cooper Creek alternative could then connect and allow for multiple passing lanes.

I attended the Soldotna meeting where the following points were raised and the answers seemed unsatisfactory:

- The very steep grade (5.9% out of a maximum recommended 6%) will pretty much preclude use by truckers and bicyclists, who will wisely choose the flatter route.

RESPONSE: While nothing is currently proposed that would legally prevent trucks from using the "old highway," it is anticipated that the wider lane width, shoulders, clear zone, easier curves, passing lanes, higher speed limit, and ability to maintain consistent speeds will cause most truck traffic not destined for Cooper Landing to use the main highway under all build alternatives. The EIS recognizes that during some winter conditions, commercial operators may choose to use the old highway. In such cases, the risk of spills is no greater than would be experienced under the no build condition. However, under most operating conditions, trucks will use the Juneau Creek Alternative.

Each of the build alternatives will have an 8-foot shoulder, which meets the safety requirements for bicycles and pedestrians along a Rural Principal Arterial highway. Given the level of bicycle and pedestrian activity on the highway outside of Cooper Landing, DOT&PF believes the wider lanes and shoulders would sufficiently increase safety for pedestrians and bicyclists along the new highway segments. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, making the old highway safer by reducing traffic, and the remaining old highway would be reclassified to function as a minor arterial or major collector with reduced speeds.

- The loss of wetlands would be greater than any other route. Cut and fill will be incredibly damaging and involved increased truck traffic as gravel is hauled in.

RESPONSE: DOT&PF and FHWA have fully disclosed the wetland impacts associated with the Juneau Creek Alternative, including impacts during construction. The Juneau Creek Alternative would include more fill in wetlands but would move traffic away from the Kenai River over the longest distance. Both the wetlands and river are considered “waters of the United States” under jurisdiction of the Clean Water Act. FHWA’s determination is that moving the highway farther away from the Kenai River by selecting the Juneau Creek Alternative will result in less harm overall and be less environmentally damaging, despite the higher amount of fill in wetlands. Additionally, the Final EIS includes a draft Clean Water Act 404(b)(1) analysis (Appendix G) documenting the wetland impacts and proposing mitigation.

- Four crossings for wildlife in 10 miles is completely unsatisfactory and is testament to the hubris of politicians, engineers and fishing groups who seem unable to understand that we live in a shared environment, and that is good for us all.

RESPONSE: DOT&PF and FHWA worked with biologists from the Forest Services, USFWS, and ADF&G to develop a mitigation plan to provide crossing locations for wildlife based on modeling and camera trap data produced for the project. The wildlife crossings are proposed to be in locations anticipated by project biologists to be where large mammals will use them. In addition, DOT&PF and FHWA added a crossing based on comments on the Final EIS.

- The bridge is long and wide and the proposed trail reroute could generate conflict between hikers and wildlife, particularly bears. It is a completely unnecessary, costly (but no doubt exciting) engineering project.

RESPONSE: The abutments for the bridge are set back 200 feet from the edge of the canyon. To minimize the potential for bear-hiker conflicts, the trail will be moved as close to the abutment as practical to maximize the remaining corridor for wildlife. In addition, DOT&PF and FHWA added a crossing (denoted #10 in Appendix I of the Final EIS) based on comments on the Final EIS to reduce potential conflicts between hikers and wildlife in this vicinity.

As a lifelong resident who respects my wild neighbors, I request that you rethink this proposal.

Peggy Mullen
rivercitybooksak@gmail.com
43965 Sterling Highway, Ste.A
Soldotna AK 99669

ID: 1488 **Source:** Web **Date Submitted:** 4/16/2018
Name: Chris Walker
Organization:

I would like to ensure that full access is avalible for the kenai river during construction. I am concerned about noise issues in the surrounding valley from the road.
I want there to be parking avalible along the new road to access the surrounding forest I hope it is not a fenced limited access road

Sent From My IPhone

RESPONSE: The Juneau Creek Alternative has the least amount of construction along the Kenai River. The contractor would create a Traffic Control Plan. The Traffic Control Plan would preemptively outline detours and other traffic modification strategies to ensure that access to businesses and recreation sites would be retained, delays would be minimized, and traffic flow would be maintained to the extent practicable during construction. To further reduce construction impacts, construction activities that conflict with access would be scheduled outside high-use summer periods, to the extent possible. In addition, notification of construction activities and potential road closures would be given well in advance. Of particular concern is access to popular recreation sites in the area. DOT&PF would closely coordinate with the land and resource management agencies during the design phase to ensure access and operational concerns associated with popular recreation sites and associated administrative sites would be reflected in construction plans and specifications. For example, special attention would be given to minimizing impacts to access and use of the Sportsman's Landing-Russian River Ferry, the USFWS visitor contact station, the Fuller Lakes Trailhead, Forest Service campgrounds and trails, and the turn onto Skilak Lake Road/Jim's Landing during highway construction.

A noise study was prepared for this project and has been updated for the Final EIS. It included sound measurements in the project area and modeling of sound levels for dozens of homes, community facilities, campgrounds and other recreation sites, and dispersed and Wilderness recreation areas. Noise is addressed in Section 3.15 of the EIS.

DOT&PF and FHWA worked with adjacent land managers and have agreed to provide pull-out parking where those managers need/desire it to support their land management objectives.

ID: 1489 **Source:** Web **Date Submitted:** 4/16/2018
Name: Devon Descutner
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Devon Descutner and I support a Walkable Cooper Landing. As a seasonal worker at Alaska Wildland Adventures, I walked or rode a bike to and from Kenai Riverside Campground and the Kenai

Riverside Lodge about a half of a mile down the road every day. Although this mere half of a mile wasn't an especially long haul, it was my daily commute to and from work to my "home" at camp. This was just my routine commute. At other times, I would walk with friends to build a camp fire further down the road at Turquoise, or we would walk in the other direction to Sackett's - a far more adventurous journey that involves crossing the highway. Throughout the summer I can recall also walking to the Cooper Landing Historical Society Museum and a few times I biked to Widman's or the food trucks outside of the store.

Just like I did, residents and visitors of Cooper Landing, AK have made their way through the community along this path parallel to the Sterling Highway for decades. But it is undeniable that there is room for improvement. Now the Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek

where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,
Devon Descutner

ID: 1490 **Source:** Email **Date Submitted:** 4/16/2018
Name: Janette Cadieux **Title:** Chair
Organization: Cooper Landing Advisory Planning Commission

Dear Mr. Elliott:

I am attaching my personal comments regarding the Sterling Hwy MP 45-60 Project Final Environmental Impact Statement. Thank you for your careful consideration of these comments. You will see that I am copying Terri Marceron, Andy Loranger, and Charlie Pierce.

Please feel free to contact me for any follow-up or clarification that may be warranted.

Respectfully,

Janette Cadieux
Cooper Landing Resident

RESPONSE: The attachment is found at ID 1497.

ID: 1491 **Source:** Web **Date Submitted:** 4/16/2018
Name: Barbara Atkinson
Organization:

I believe "summer time" traffic through Cooper Landing can be safely controlled without the proposed bypass. The amount of money spent studying this so ridiculous. When just a taking out Gwin's corners many years ago would have help tremendously.

The valley is to narrow. It will flat out destroy the most beautiful valley in all Alaska, along with many hiking trails. The noise from traffic up above will be unbearable.

HOPING IT DOESN'T HAPPEN IN MY LIFETIME!

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1492 **Source:** Web **Date Submitted:** 4/16/2018
Name: Greg Raveaux
Organization:

After almost 3 generations of speculation and discussions, it is hopefully going beyond the lip service, and progressing for bypass development!! The traffic backups, the vehicle collisions from speeders and over aggressive commuters is frightening to say the least. The bypass beginning at the north end is hopefully before the Sunrise Inn development, and avoids the canyon area. A Bike lane would be a safety addition that will save some lives in the future. On any hill, hopefully signs preventing/fining the use of jake brakes would be recommended. Any pull outs for viewing Kenai Lake would be a nice addition. The stores worried about a loss of business, should realize CL as a destination will improve tourism, and quality of life!

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm. DOT&PF and FHWA worked with adjacent land managers and have agreed to provide pull-out parking where those managers need/desire it to support their land management objectives. The land managers requested these pullouts and have agreed to maintain them.

During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would

connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

ID: 1493 **Source:** Web **Date Submitted:** 4/16/2018
Name: Doug Hayman
Organization: Cooper Landing School

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Please see attached letter.

Thank you.
Doug Hayman Principal
Cooper Landing School

Attached text follows:

Cooper Landing School
19030 Bean Creek Road
Cooper Landing, AK 99572

April 11, 2018

Brian Elliott, Environmental Manager
DOT&PF Central Region
Sterling Highway MP 45-60 Project
PO Box 196900
Anchorage, AK 99519-6900

Dear Mr. Elliott:

I am writing to you on behalf of Cooper Landing School. We wish to express our thoughts in response to the Final Environmental Impact Statement for the Sterling Highway MP 45-60 Project. We would appreciate your consideration of the points below, as they will directly affect the safety of students, parents, staff, and visitors, as they travel to and from our school.

- The two interchange points of the Bypass and existing roadway are concerning because, as planned, they rely on "T" intersections which create left turns across 55 mph traffic and do not provide a complete solution for intense periods of use. Unsafe merging and inevitable congestion are likely outcomes of this design.
- The MP 45-60 Project Design does not appear to address or provide safe crossing of the safety path or any other for bike/pedestrian traffic. We wish to improve conditions and opportunities for walking and

bicycling and to integrate walking and bicycling into other transportation systems.

- We also urge project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road.
- Goals of the Cooper Landing Walkable Community Project's Plan should be included, such as improving the existing "Safety Path" with the established components of rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility. Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the safety issues created by the Bypass Project

Thank you for the opportunity to express the interests of Cooper Landing School regarding the Sterling Highway MP 45-60 Project. We will be impacted greatly by this project and hope that you will address these concerns raised by our community.

Sincerely,
Doug Hayman
Cooper Landing School Principal
dhayman@kpbsd.k12.ak.us

CC:
Chugach National Forest
Supervisor's Office
Attn: Forest Supervisor Terri Marceron
161 East 1st Ave., Door 8
Anchorage, AK 99501
mailroom r10 chugach@fs.fed.us

Kenai National Wildlife Refuge
Attn: Refuge Manager Andy Loranger
P .0. Box 2139
1 Ski Hill Rd.
Soldotna, Alaska 99669-2139
kenai@fws.gov

Kenai Peninsula Borough
Attn: Charlie Pierce, Mayor
144 North Binkley St.
Soldotna, AK 99669 cpierce@kpb.us

ID: 1494 **Source:** Web **Date Submitted:** 4/16/2018
Name: Todd Donahue
Organization: 1965

Todd & Michelle Donahue
19906 Sterling Hwy/Mile 47
Cooper Landing, AK 99572

We bought our first piece of property in Cooper Landing because we loved the tranquility, the wildlife, the pace of a small town atmosphere. 3 years later we bought our home and moved here full time. Here we are 2018, 3 years from paying off our home, retirement in sight and now we have a highway that were told is going to be wrapping around 3 sides of our property. It appears that it will be wrapping around our house on 3 sides 100-300 feet from our property line merging at our driveway at one point. We have many concerns!

SAFETY- May- October we run a fishing business. We are pulling boats in and out of our driveway. With the on/off ramp merging at our driveway with summer being the busiest time of year in Cooper Landing we are concerned with motorhomes, semi trucks and tailers (that choose not to bypass) the safety of using our own driveway

RESPONSE: Based on the current preliminary design, it is anticipated that your driveway is set back far enough from the intersection and would have sufficient site distance to provide safe access. During final design, DOT&PF engineers and right of way professionals will work with you to develop options for safe and effective access to your property.

VISUAL- We have a coveted piece of land that is south facing, good gravel/drainage and an amazing view of Ceicil Rhodes in our front yard and Langle in back with privacy. We have had moose brown and black bears, coyotes, lynx, eagles and snow shoe rabbits that we have seen in our yard. We love the wildlife that lives in our back yard. We have even had a sheep visit once that we have seen. Now were going to be surrounded on 3 sides with traffic and potencial headlights coming in our windows. We have campfires in our backyard with clients all summer/fall and frequently throught the winter/spring months. The tranquility and serenity that brought us here is now being threatened. We were told at the meeting you had here in Cooper Landing and Anchorage that you feel no barriers are needed in any of your new bypass areas because barriers will be in effective due to your research.

RESPONSE: The project conducted a required noise analysis for all the project alternatives, including for the G South, Juneau Creek, and Juneau Creek Variant alternatives, which have similar impacts in the vicinity of your property. The FHWA traffic noise analysis does not demonstrate the need for noise mitigation in this location. Further analysis of options for considering noise abatement may be explored during final design.

SOUND- We do live on the Sterling highway and do have traffic noise out front mainly in the month of July during dipnet season. Now we will be surrounded on 3 sides of traffic. I know we've been told only 30% of the traffic will now be coming thru Cooper Landing but it is still literally wrapping around our home. Three lane highway in our backyard with a 5-6% grade not only lends itself to jake braking but also to acceleration pipes humming while climbing (this came from a trucker that we spoke to regrading the 5-6% grade)

RESPONSE: Your comments are noted. As mentioned above, further analysis of options for considering noise abatement may be explored during final design.

Our concerns are real. We live here 24/7 and are looking at the "BIG" picture. We currently live in rural Alaska which was our dream come true moving here and to this location. We were planning on retiring here and loving our life. However your proposed highway at mile 47 (which is wrong on your map by the way) is right at our driveway. We, Todd and Michelle Donahue are highly impacted with your current plan. We are impacted more than any other Cooper Landing resident.

RESPONSE: Preliminary engineering has only identified that four private properties would require partial acquisitions for the Juneau Creek Alternative. Your property concerns will be forwarded to the design engineering team and the right-of way-professionals to assess property needs and impacts.

Adversely affected and appropriately qualified property owners would be assured fair compensation, as provided by the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended, and the Alaska Relocation Assistance and Real Property Acquisition Practices, Statues (AS) 34.60.010 et seq.

We would love the opportunity to invite some of your surveyers/planners down to hike around our back yard to discuss and evaluate your proposal with live feedback.

RESPONSE: Comment noted. The DOT&PF design team will be informed of this offer.

We need more detail about your on/off ramp at mile 47. As it appears you will have left turn issues at peak times. We would also like information about how you will discourage large vehicles from entering the town and keeping them on the bypass at all times for safety issues and to fulfull the proposed purpose of the bypass.

RESPONSE: The intersections will be engineered to be safe and meet the traveling needs commensurate with a NHS facility. The intersections are planned to have turn lanes and would be lit to facilitate the safe exchange of traffic between the old and new highways. While nothing is currently proposed that would legally prevent trucks from using the "old highway," it is anticipated that the wider lane width, shoulders, clear zone, easier curves, passing lanes, higher speed limit, and ability to maintain consistent speeds will cause most truck traffic not destined for Cooper Landing to use the main highway under all build alternatives. Large vehicles will continue to make deliveries to Cooper Landing and as such will need to access the community. Despite being a long environmental process for this project, the level of engineering is preliminary. We appreciate the invitation and your willingness to discuss these issues and work with us. Our engineers will be better able to provide these details during final design.

PLEASE realize the impact of this project is huge for us. It is a real concern for our future. We look forward to sitting down and discussing in more detail what options may be available to us. Were not looking for a buy out. We can't afford to purchase anything here in Cooper Landing at todays market prices. Another mortgage isn't ideal for us either. However if we do get to a point where everything is a go we would love to discuss a land swap so we can stay in Cooper Landing. So as we get closer and hard decisions are made, please contact us.

RESPONSE: Comment noted. As indicated above, the concern will be forwarded to the DOT&PF design team.

Lastly we are requesting a written reponse before the record of decision on ALL of questions in this letter.

RESPONSE: Responses to all comment letters have been published as part of the ROD.

Thank you for your time and please take us up on our invitation to come down and talk to us.

Todd & Michelle Donahue
19906 Sterling HWY/mile 47
Cooper Landing, AK

ID: 1495 **Source:** Web **Date Submitted:** 4/16/2018
Name: Ricky Gease
Organization: Kenai River Sportfishing Association

Please see attached letter regarding public comment from the Kenai River Sportfishing Association in support of the Juneau Creek Alternative as the preferred alternative in the EIS and recommendation that it is the preferred alternative in the final Record of Decision.

Attached text follows:

April 16, 2018

Sandra Garcia-Aline,
Division Administrator
U.S. Department of Transportation
Federal Highway Administration
PO Box 21648
Juneau, AK 99802-1648

Dear Sandra Garcia-Aline,

Kenai River Sportfishing Association (KRSA) is a nonpartisan, nonprofit fishery-conservation organization of Alaskans that works to ensure the long-term health and sustainability of fish resources in the Kenai River and elsewhere in Alaska, through advocacy of sport and personal-use fisheries and the promotion of science-based fish management. KRSA strongly supports the Federal Highway Administration (FHWA) and the Alaska Department of Transportation and Public Facilities (DOT&PF) finding of the Juneau Creek Alternative as the preferred alternative in the Sterling Highway Milepost 45-60 Project Final Environmental Impact Statement and Final Section 4(f) Evaluation (EIS).

KRSA firmly backs the Juneau Creek Alternative as the preferred alternative and agree with the EIS conclusions that find:

- FHWA has determined the Juneau Creek Alternative would have the least overall harm.
- The Juneau Creek Alternative would best satisfy the project purpose and need—both its transportation elements and the element of protecting the Kenai River.
- It would have the highest level of service of any of the alternatives, would be routed farthest overall away from the Kenai River, and cross the fewest salmon streams.
- The Juneau Creek Alternative would affect the least acreage and the fewest archaeological properties of any of the alternatives.
- Because of risks to the Kenai River from potential spills associated with highway traffic and the consideration of other environmental impacts and purpose and need factors, FHWA and DOT&PF believe the Juneau Creek Alternative is the Least Environmentally Damaging Practicable Alternative (LEDPA), despite it having greater wetland impacts (see Appendix G of the EIS). The U.S. Environmental Protection Agency also has commented that one of the Juneau Creek alternatives is likely the LEDPA.
- The Juneau Creek Alternative would divert traffic from the river over the greatest road length, would

have no bridge construction in the Kenai River, provide for the greatest reduction in number of crashes, have the least number of longitudinal encroachments to the Kenai River, and in terms of Fish and Essential Fish Habitat, have the least impacts in terms of acres and crossing (bridges, culverts).

- The Juneau Creek Alternative would be the least expensive to construct, and would have the lowest cost in terms of total expenditures over 20 years.

For these reasons, KRSA recommends that the Juneau Creek Alternative is finalized as the preferred alternative in the upcoming Record of Decision.

Thank you for your time and attention to this important issue.

Sincerely,
Ricky Gease,
Executive Director Kenai River Sportfishing Association
35093 Kenai Spur Highway
Soldotna, AK 99669
907-262-8588

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1496 **Source:** Comment Form **Date Submitted:** 4/2/2018
Name: Anonymous
Organization:

Do we really need a speedier highway in this area? It's Alaska, so I don't think so. The gain doesn't outweigh the loss.

I 'vote' for the 'do nothing' alternative.

RESPONSE: Comment noted.

ID: 1497 **Source:** Email **Date Submitted:** 4/16/2018
Name: Janette Cadieux **Title:** Chair
Organization: Cooper Landing Advisory Planning Commission

Janette Cadieux
P.O. Box 873
Cooper Landing, AK 99572

April 16, 2018

Brian Elliott,
Environmental Manager

DOT&PF Central Region
Sterling Highway MP 45-60 Project
P.O. Box 196900
Anchorage, AK 99519-6900

Dear Mr. Elliott:

I am writing to express my thoughts and opinions regarding the Sterling Highway MP 45-60 Project Final Environmental Impact Statement (EIS). For ease in conveying my thoughts and ease in tracking them I will provide them in bulleted format below. I will call the project "Bypass."

I believe there are other. less-expensive and less-damaging ways to accomplish the project goals. While there are benefits to the proposed Bypass, the ecological and other damages (including economic) it will inflict are just not worth it. The EIS fails to adequately address the 4f problems with the project. That being said, if this Bypass is built there are things that should be addressed.

RESPONSE: DOT&PF and FHWA conducted a rigorous alternatives development and screening process, and fully evaluated the alternatives through a least overall harm analysis as required by Section 4(f). DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm. The selected alternative happens to be the least costly of the alternatives; although, FHWA did not find the differences in costs among the build alternatives to be substantial.

- A roadway where there is none now will have a huge environmental impact that is inadequately weighted and addressed in the EIS. The hydrological impact, animal travel impact, danger of worsening the spruce bark beetle resurgence, risk of invasive species introduction, and noise and visual impacts to the area as well as many others will be severe. The mitigation plan inadequately addresses these and needs to be reexamined.

RESPONSE: DOT&PF and FHWA have described and disclosed the impacts you mention. In fact, special technical studies were completed on hydrology, animal movements, noise, and visual impacts. The proposed mitigation has been coordinated with land management and permitting agencies. FHWA believes the proposed mitigation adequately mitigates the impacts.

- The project plan fails to recognize the cumulative loss of the myriad, small wetlands and the filtering function that they provide for· the Kenai River watershed. A specific plan to address wetland loss where it occurs and mitigate in those places must be developed. Mitigation elsewhere is a ridiculous concept and fails to meet the goal of protecting the Kenai River. All culverts should be designed to address the rapid run-off problem of putting. a roadway where there currently is none. The hydrological impact of this project needs to be more carefully examined and addressed than it currently is. Paying a fee in lieu of creating or enhancing wetlands is just not consistent with the stated goal of protecting the Kenai River. If we move the highway away from the river to protect the river from spills but we damage the wetlands that protect the river, the net result is still damage to the Kenai River watershed and long-term loss of the vital resource that the Kenai River represents to the Kenai Peninsula. Wetland loss will kill the Kenai River, just more slowly than a giant fuel spill.

RESPONSE: The project's development included field mapping and verification of wetlands and their functions within the project area, documented in special studies supporting the analysis. The Final EIS (Appendix G) includes a draft Clean Water Act 404(b)(1) analysis, documenting the wetland impacts and proposing mitigation. DOT&PF is in the process of conducting wetland permitting with the U.S. Army Corps of Engineers and will further refine wetland mitigation as part of that permitting process. That mitigation will either include fee-in-lieu or permittee responsible mitigation to mitigate for the wetland impacts associated with the project. Finally, cumulative wetland impacts are discussed in Section 3.27 of the Final EIS.

- The EIS inadequately addresses the historical and cultural impacts of the new alignment and needs co he further developed along these lines.

RESPONSE: Section 3.9 of the Final EIS documents historic and cultural resource impacts. The project followed the Section 106 process required by the National Historic Preservation Act, with full consultation of consulting parties at each step of that process, culminating in a signed Programmatic Agreement that fully mitigates for the impacts (Appendix K of the Final EIS). The analysis was based on considerable field work, which documented historic and cultural sites for each of the alternatives. The selection of Juneau Creek Alternative is, in part, based on the consideration of historic and cultural resources. The selected alternative avoids highly sensitive lands bisected by the Juneau Creek Variant alternative and affects considerably fewer known sites than any of the other alternatives.

- The problem at MP 49-50.5 that has been a pinch point and engineering problem for years on the existing Sterling Highway is in all likelihood, not an isolated geologic feature in the upper Kenai River valley. The new alignment will undoubtedly come across similar glacial remains, unstable soils and rock. water flow off the mountains, etc. that will create engineering problems and raise the stated costs of the Bypass. The current cost estimate is not accurate and should be revised. The existing roadway will have more than "local" traffic, especially seasonally. The safety concerns with the existing roadway need to be fixed regardless of the building of a Bypass. Reducing the amount of traffic will aid but not resolve the safety issues of the existing Sterling Hwy. The EIS suggests that by removing 70% of the traffic then all is well on the existing road. That is just not true. The existing roadway needs fixing and this should be the first phase of the project.

RESPONSE: Geotechnical engineers evaluated the soils and geology for each of the alternatives, and project engineers used that information to identify alignments considered technically feasible. The cost estimates done at this 30 percent level of design include considerable contingency to account for unknown conditions.

The difference with the Juneau Creek Alternative (as opposed to the pinch point on the current alignment) is that cuts for the Juneau Creek Alternative are not butted up against a steep, high mountain; therefore, a slope failure is not a concern. At the location identified as pinch point on the current alignment, the concern is that a slope failure could literally dam the Kenai River. Because the Juneau Creek Alternative is located well away from the river for most of its length, that is not a concern.

The Final EIS included a new crash analysis report (Appendix A) that documents predicted crashes in 2043 based on the Highway Safety Manual Predictive Method procedures. Compared to the No Build Alternative, the Juneau Creek Alternative has substantive safety benefits for both NHS traffic and the traffic on the old highway. The analysis predicts a 69.7 percent reduction in crashes on intersections and segments on the Juneau Creek Alternative as compared to the No Build Alternative. When considering crashes on both the old and new highways as a system, building the Juneau Creek Alternative results in

a 48.9 percent decrease in crashes on the system overall as compared to doing nothing.

- Even if traffic splits out 70/30 as predicted, all traffic is likely to increase in volume over time. The current EIS inadequately plans for that increase on the existing Sterling Hwy corridor. Safety problems will rise over time as more traffic uses the old alignment. Fixing the safety problems and building a bike/ped path must be done as a part of this Bypass plan and it must be built as one of, if not the first, phase of the project.

RESPONSE: The EIS does account for increases in traffic over time. The traffic and crash analyses both used a forecast of traffic growth out to the design year. The results of the analyses show that congestion and safety are improved on both the new alignment and the old Sterling Highway in the design year under the Juneau Creek Alternative.

Each of the build alternatives will have an 8-foot shoulder, which meets the safety requirements for bicycles and pedestrians along a Rural Principal Arterial highway. Given the level of bicycle and pedestrian activity on the highway outside of Cooper Landing, DOT&PF believes the wider lanes and shoulders would sufficiently increase safety for pedestrians and bicyclists along the new highway segments. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway.

- Fewer but more severe, high--speed crashes will occur on the Bypass. There is no statement regarding funding or support for local emergency services to deal with this increased burden. The costs of a new ambulance and vehicle extraction equipment should be included in the project budget. The economic burden of this should not rest on the community of Cooper Landing.

RESPONSE: More severe crashes are not projected to occur on the bypass. The crash analysis indicates that 10.9 fatal and injury crashes per year would occur in 2043 under the No Build Alternative, while 3.3 are predicted under the Juneau Creek Alternative. Based on the crash analysis, the economic burden to the community to provide emergency response will decrease.

- What data or research has established that an 8' shoulder is "adequate for safe bicycle and pedestrian use?" With increased and high-speed traffic on the proposed Bypass, requiring bikers and pedestrians to use the shoulder is short-sighted. It does not adequately consider the transportation needs of all users in this corridor. Many pedestrians and bicyclists would undoubtedly choose to use the more-scenic and "quiet" corridor through Cooper Landing once it is separated from the Bypass except that it will remain unsafe with no shoulders or place to bail-out in an emergency. Being struck by a car or truck moving at 35 mph can still kill you. The Cooper Landing Walkable Community Project should be built along the existing: highway alignment, at least to the extent that a serviceable, separated bike/ped path would create a realistically safe means for bike/ped traffic to move through this travel corridor. This would provide an option more realistically safe and superior to the 8' shoulder on the Bypass. It would also provide economic mitigation to the community as this type of infrastructure is known to do.

RESPONSE: Eight-foot shoulders are adequate per *AASHTO's A Policy on Geometric Design of Highways & Streets* and *Guide for the Development of Bicycle Facilities*. The segment of existing Sterling Highway left under any of the alternatives would no longer be part of the NHS, and would be

reclassified to a lower functional classification, likely as minor arterial or major collector. That means the road would provide less of a statewide function and would be intended to serve more localized trips, characterized by slower speeds, which are safer for accessing adjacent properties. Removing through-traffic drivers from the "old" highway could leave the "old" highway a candidate for a lower speed limit.

During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the "safety trail") that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the "safety path" that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

- The alignment or the roadway from MP 55-58 should be shifted away from the Kenai River to the extent possible and reasonable. Rip·rap on the river bank damages downstream habitat. It is not a permanent solution and should be dealt with within this project.

RESPONSE: The alignment in this section is driven, in part, by the Wilderness boundary north of the highway. The anticipated land exchange between CIRI and USFWS may make it possible to shift the alignment farther north to create better separation from the river. This idea will be looked at during final design.

- There is no over or under pass on the east end of the project for movement of people or wildlife north/south across the highway to access trails, the Safety Path, campgrounds, Kenai Lake, Quartz Creek, businesses, or residences on either side. The Bypass will undoubtedly encourage traffic speeds greater than 55 mph. It is already unsafe to attempt crossing the Sterling Hwy near MP 45. It will become only more so as the Bypass allows folks to move at sustained highway speed and not the currently posted 45 mph at the interchange with Quartz Creek Rd. Some means of moving folks north/south across that highway must be incorporated into the project at or near MP 45. This is both a safety and an economic concern that can easily be dealt with.

RESPONSE: An underpass in the MP 44–45 area, near Quartz Creek Road, was considered by engineers in preparation for the Final EIS. The topography is not conducive to providing an underpass in the MP 44–45 area. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway (to replace the informal path that was on the north side of the highway). This trail would connect from Quartz Creek Road to the Old Sterling Highway to connect with the "safety trail." From there, trail users could make their way to the north side of the highway using the Slaughter Gulch Trail undercrossing being installed under the new highway. Moreover, by replacing the current trail running on the north side of the highway on the south side, there will be considerably less demand to cross the trail in that location.

- The current Sterling Highway corridor serves as a vital, though inadequately structured, linkage between federal lands and facilities. Folks need to safely move from the Russian River and Lakes

trails to the Resurrection Pass Trail Conservation System Unit but they cannot. Folks need to safely move from the Resurrection Pass Trail CSU to the campgrounds at Russian River. Cooper Creek, Quartz Creek, and Crescent Creek, but they presently cannot. A separated bike/ped pathway including across the Kenai River and Cooper Creek bridges would connect trails to trails, trails to campgrounds, and campgrounds to campgrounds. Would this not be the most appropriate mitigation for loss of the integrity of the Resurrection Pass Trail Conservation System Unit?

RESPONSE: The proposed mitigation is specific to the Resurrection Pass Trail and was proposed and coordinated with the Forest Service as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation to local community trails.

- The current mitigation plan for the EIS needs to be re-thought. It does not guarantee mitigation in the project area affected but it should. Mitigation for resource and economic impacts should be local to the community of Cooper Landing. By this means, it will have the greatest impact to the natural resources and economics of the Kenai Peninsula.

RESPONSE: Proposed mitigation is intended to be tied to an impact and generally is tied as closely to the impact area as possible. Again, the mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation to local community trails or economic impacts.

- The Safety Path running along the Sterling Highway between MP 45 and 50, was created in 1993 to provide a safer means of pedestrian travel within the community. It must be protected and people need to have maintained use of the Safety Path especially where it intersects the Bypass at approximately MP 46 where the Bypass leaves the existing road alignment The Safety Path was built by local DOT crew, funded in part by the legislature through the STIP, and has been in continuous use since it was built. We must have continued safe access to the Safety Path.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and would use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

As a member or the community of Cooper Landing I fully share/support the concerns raised by our Advisory Planning Commission and list them below. Please also heed the comments submitted by the United States Fish and Wildlife Service for greater details on what some of the ecologic impacts of this project may be.

RESPONSE: This remainder of this letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the Kenai River that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not allow overnight camping but should allow for overnigt parking, as many users will park here for overnight hiking trips.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures·would help to address the issues created by the Bypass Project. Improving the "walkability" within the existing, Sterling Highway corridor will not only enhance safety and access for pedestrians and bicyclists but will also enhance the economy of the community by attracting visitors who can safely and effectively visit both businesses and the local recreation attractions. This should be the minimum level of mitigation for the extensive recreational and economic impacts upon the Cooper Landing community by this project. Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems. Please see the following web pages for greater information about the Coorer Landing Safety Path: http://www.walkcooperlanding.org/safety-path/ and http://www.walkcooperlanding.org/historical-timeline/.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from Quartz Creek Road and all of the businesses and recreational facilities accessed there. We feel that failing to provide this crossing would be negligent.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.
- It cannot be overstated that there should not be any driveway permits or other methods of road access

to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.

- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
        - Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
    - Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Thank you for the opportunity to express my interest and concerns regarding the Sterling Highway MP 45-60 Project. This project is fraught with problems and not all of them can be engineered away but that doesn't mean we should just throw up our hands. The ecologic and economic impacts of this project on the Cooper Landing area and the Kenai Peninsula Borough require another look, further development, and implementation of the Sterling Hwy MP 45-60 Project plan. If you have any questions regarding the above lists, please feel free to contact me. I will list my contact information below.

Sincerely,

Janette Cadieux,
Cooper Landing
907·595-4686, jette.cadieux@gmail.com

CC:
Chugach National forest
Supervisor’s Office
Attn: Forest Supervisor Terri Marceron
161 East 1st Ave, Door8
Anchorage, AK 99501
mailroom_r10_chugach@fs.fed.us

Kenai Peninsula Borough
Ann: Charlie Pierce, Mayor

144 North Binkley St.
Soldotna, AK 99669
cpierce@kpb.us

Kenai National Wildlife Refuge
Attn:·Refuge Manager Andy Loranger
P.O. Box 2139
1 Ski Hill Rd.
Soldotna, Alaska 99669-2139
kenai@fws.gov

ID: 1498 **Source:** Email **Date Submitted:** 4/16/2018
Name: Theo Lexmond
Organization:

Dear Mr. Elliot,

Attached please find my public comment submission to the Sterling Highway Milepost 45-60 Final Environmental Impact Statement. Please confirm that my public comment has been received. Thank you. Theo Lexmond

Theo Lexmond
P.O. Box 873
Cooper Landing, Alaska 99572

RESPONSE: The attachment is found at ID 1523.

ID: 1499 **Source:** Email **Date Submitted:** 4/16/2018
Name: Terri Marceron **Title:** Forest Supervisor
Organization: Forest Service

From: Lohrey, John (FHWA) [mailto:John.Lohrey@dot.gov]
Sent: Monday, April 16, 2018 2:13 PM
To: 'kelly.summers@alaska.gov' <kelly.summers@alaska.gov>; McPherson, John <John.McPherson@hdrinc.com>
Cc: Garcia-Aline, Sandra (FHWA) <Sandra.Garcia-Aline@dot.gov>
Subject: FW: CNF Comments on Sterling Hwy MP 45-60 FEIS & Final Section 4(f) Evaluation

FYI,

Forest Service comments.

From: Zimin, Maile - FS [mailto:mailezimin@fs.fed.us]
Sent: Monday, April 16, 2018 12:38 PM
To: Lohrey, John (FHWA) <John.Lohrey@dot.gov<mailto:John.Lohrey@dot.gov>>
Cc: Marceron, Terri -FS <tmarceron@fs.fed.us<mailto:tmarceron@fs.fed.us>>; LaBrecque, Sharon –FS

<slabrecque@fs.fed.us<mailto:slabrecque@fs.fed.us>>; Sanchez, Francisco B –FS
<fbsanchez@fs.fed.us<mailto:fbsanchez@fs.fed.us>>; Berg, Griffith Q –FS
<gqberg@fs.fed.us<mailto:gqberg@fs.fed.us>>; Kuntzsch, Deyna –FS
<dkuntzsch@fs.fed.us<mailto:dkuntzsch@fs.fed.us>>; Marchowsky, Kori –FS
<kmarchowsky@fs.fed.us<mailto:kmarchowsky@fs.fed.us>>; Chase Veach, Kelly – FS
<kchaseveach@fs.fed.us<mailto:kchaseveach@fs.fed.us>>; Kromrey, Karen –FS
<kkromrey@fs.fed.us<mailto:kkromrey@fs.fed.us>>; Kinsner, John – FS
<jkinsner@fs.fed.us<mailto:jkinsner@fs.fed.us>>; Hayward, Greg –FS
<ghayward01@fs.fed.us<mailto:ghayward01@fs.fed.us>>; Thomas, Amy – FS
<aethomas@fs.fed.us<mailto:aethomas@fs.fed.us>>; VanOrmer, Chad M –FS
<cvanormer@fs.fed.us<mailto:cvanormer@fs.fed.us>>; King, James – FS
<jamesgking@fs.fed.us<mailto:jamesgking@fs.fed.us>>
Subject: CNF Comments on Sterling Hwy MP 45-60 FEIS & Final Section 4(f) Evaluation

Good Afternoon John,

I am sending this letter to you on Terri Marceron's behalf as she is traveling and in meetings today. I will place the hard copy in the mail this afternoon.

Please let me know if there's anything else you need.

Thank you,
[Forest Service Shield]

Maile Zimin
Acting Executive Assistant

Forest Service Contractor
Chugach National Forest

p: 907-743-9523
f: 907-743-9476
mailezimin@fs.fed.us<mailto:mailezimin@fs.fed.us>

161 E 1st Ave Door 8
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Caring for the land and serving people

RESPONSE: The attachment is found at ID 1509.

ID: 1500 **Source:** Web **Date Submitted:** 4/16/2018
Name: Rick Holland
Organization:

I believe this project is a waste of over a quarter billion dollars. For over 25 summers I drove between Anchorage and Soldotna every weekend. At no time did I ever experience any appreciable traffic through Cooper Landing. Yes the speed limit through that area is between 35 and 55 miles per hour but, this waste of money will save on average less than 10 minutes on a 2 to 4 hour drive depending on the final destination.

During the heaviest traffic times of the year many travelers will ignore the new bypass to drive by the scenic Kenai River either for the scenery or to utilize the river creating potential traffic jams at each end of the existing Cooper Landing road when they try to re-enter the main road. During the remainder of the year most traffic will bypass Cooper Landing destroying nearly every existing business that tries to operate over the winter.

As written the EIS gives many options one of which is to do nothing. In this case nothing is the best course of action. Doing nothing doesn't disrupt the Ressurection Trail, doesn't require building a long bridge and doesn't disrupt people's livelihood.

If you absolutely need to justify the money already spent and the years of study fixing the section of road between Sunrise and Wildmans will go a long way to improving safety.

Back to my original point of Cooper Landing not being a traffic issue. The only place I have encountered regular traffic issues is at the Sterling Highway Seward Highway intersections. That's not part of the study but fixing that intersection would decrease traffic.

Thanks
Rick Holland

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm. The purpose and need for the project is to reduce congestion, bring the highway up to current standards, and improve safety, not to save people time between Anchorage and Soldotna. Compared to the other build alternatives, the Juneau Creek Alternative performs the best on measurable purpose and need criteria. The data bear out that the Juneau Creek alignment will substantially reduce the risk of crashes and improve congested conditions better than the other alternatives.

ID: 1501 **Source:** Web **Date Submitted:** 4/16/2018
Name: Michael Noonan
Organization:

- We live right at MP47 on the North side of the highway.
- I have asked repeatedly how close to our property will be to the On/Off ramp and how close the Hwy itself falls behind our property.
- Our well is located more than 100 yds to the North and East behind the house and we need to know if it will be impacted. (we own the water rights
- What will the Hwy project do to our property value???
- Can we expect run off from the Hwy to pollute our well??
- If imminent domain will push us off our property, when will we be notified??
- Is it possible to request to be bought out because of reduced lifestyle and property value.

RESPONSE: The 30 percent design plans are located on the project web site at: http://sterlinghighway.net/Documents/Appendix%20A%20-%20PER%20plan%20sheets%20Juneau%20Creek%204-23-14web.pdf. They have a scale bar so you can measure the distance to your property. The engineering analysis in the EIS is not developed to a level to predict individual parcels property values. Some properties are likely to increase in value, others may decrease. Runoff from the project will be managed through design with roadside drainage swales and culverts. Engineers will work with affected property owners during the design process to refine the design, understand property owners' issues, and try to make the design work for adjacent properties as best as possible. During subsequent phases, DOT&PF right-of-way agents will be available to discuss right-of-way needs and remedies. Should right-of-way be needed or access reconfigured, the right-of-way agents will be in touch with property owners. Property acquisition will be in accordance with the Uniform Relocation Act.

ID: 1502 **Source:** Email **Date Submitted:** 4/16/2018
Name: Alex Kime **Title:** Owner
Organization: Alaska Horsemen Trail Adventures

Dear Brian,

Attached are my comments regarding the Sterling Highway/Cooper Landing Bypass.

There are three attachments, a current letter and a past letter I submitted last fall as well as a photo of an underpass.

Thank you and you are welcome to call or write anytime if you have questions. My personal cell is 907-598-1806

Sincerely,
Alex Kime
--
Alaska Horsemen Guest Ranch

35090 Quartz Creek Road
Cooper Landing, Alaska 99572
www.alaskahorsemen.com <http://www.alaskahorsemen.com>
info@alaskahorsemen.com <info@alaskahorsemen.com>
(907) 595-1806

RESPONSE: See attached letter and photograph with response at ID 1522. See also attachment at ID 1547.

ID: 1503 **Source:** Email **Date Submitted:** 4/16/2018
Name: Jack Sinclair **Title:** Executive Director
Organization: Kenai Watershed Forum

Sandra A. Garcia-Aline, Division Administrator:

The following are concerns and comments regarding the Sterling Highway Milepost 45-60 Final Environmental Impact Statement and Final Section 4(f) Evaluation.

We find that the most impacted areas regarding new construction that affect the health of the watershed are in Shrub Bog Wetlands, Emergent Wetland, and Ponds; as well as all fish-bearing creeks and streams running to the Kenai River. *We would urge whenever possible to have road runoff and storm runoff be buffered through environmental engineering from running directly into these important freshwater recharge areas. *

Any funds for wetland restoration and remediation along the older existing highway route should be for maximizing fish passage and stream bank restoration efforts.

Thank you for allowing this opportunity to participate in this public process.
Sincerely,

Jack Sinclair
Executive Diretor
Kenai Watershed Forum
--
Jack Sinclair
Executive Director
Kenai Watershed Forum
44129 Sterling Highway
Soldotna, AK 99669
907-260-5449 ext. 1208
FAX: 907-260-5412
jack@kenaiwatershed.org

RESPONSE: Mitigation for water quality is detailed in the Final EIS and ROD, and includes environmentally engineered treatment such as swales and implementation of BMPs to reduce sediment and pollutants reaching receiving waters. Additional wetland mitigation will be coordinated with the U.S. Army Corps of Engineers during subsequent wetland permitting.

ID: 1504 **Source:** Web **Date Submitted:** 4/16/2018
Name: Janeen Hutchins
Organization: Alaska Wildland Adventures

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project

April 15th, 2018

DOT&PF Central Region
PO Box 196900
Anchorage, AK 99519-6900

Dear Sterling Highway MP 45-60 Project Planners,

Thank you for the opportunity to comment on the Sterling Highway MP 45-60 Project's preferred Juneau Creek Alternative and its goal of reducing congestion, improving safety and improving the highway to current standards. As you evaluate the Juneau Creek Alternative, please also keep in mind the impacts on our community and its recreation-based economy.

Safe and reliable transportation corridors are critical, not only to us as community members, but also to our business. Alaska Wildland Adventures has been based in Cooper landing since 1977 and the safety of the community and health of the local economy are extremely important to us. We believe that the Juneau Creek Alternative is the best option that has been proposed thus far but there are a few considerations that need review and adjustment.

Please consider the safety of bike/pedestrian traffic on the current Safety Path which is entirely on the north side of the Sterling Highway. Users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. Under the preferred alternative, bike/pedestrian traffic will also not have a safe crossing near Quartz Creek Road.

The MP 45-60 Project Design does not appear to address or provide safe crossing at these points. We feel that failing to provide for these uses fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

We also believe that the proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit. Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

We strongly believe that providing pedestrian walkways on the Snow River bridges on the Seward

Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail. Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Please also keep in mind that unless the use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

We also believe that there should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

We are appreciative of the imaginative solutions to wildlife corridors and with the existing trial corridors provided. We hope more of these creative solutions will be utilized to reduce the impact on wildlife.

Thank you for taking our comments into consideration and reevaluating the proposed plan to make sure that it does not exclude or come at a cost to established and needed pedestrian/bicycle traffic or the transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Janeen Hutchins
General Manager
Alaska Wildland Adventures
16520 Sterling Hwy,
Cooper Landing, AK 99572
janeen@alaska-wildland.com

ID: 1505 **Source:** Web **Date Submitted:** 4/16/2018
Name: Stephanie Lesmeister
Organization: Cooper Landing Chamber of Commerce

Brian Elliott, Environmental Manager
DOT&PF Central Region
Sterling Highway MP 45-60 Project
P.O. Box 196900
Anchorage, AK 99519-6900

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

April 14, 2018

Dear Mr. Elliot,

I am writing this letter on behalf of the Cooper Landing Chamber of Commerce and our members to make sure that the State of Alaska DOT & PF Central Region is aware of the impact that the Cooper Landing

Bypass will have on our community and livelihood. I am providing you with a list of our concerns that need to be considered and resolved before this project begins. We also wish to take this time to emphasize our support of a Walkable Cooper Landing, as our residents and visitors of Cooper Landing, AK have made their way through the community along our Safety Path parallel to the Sterling Highway for decades. The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities. Project planners should reevaluate the following considerations: ·

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.
- It cannot be overstated that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.

- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
- Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
- Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Thank you for taking our comments into consideration when the State of Alaska DOT & PF Central Region is in negotiation with the other governing agencies, HDR Consultants and any other parties working on the Sterling Highway MP 45-60 Project. We look forward to reevaluating the proposed plan to make sure that the accommodation for travel facilities for motorized traffic does not add more to impact our community is already looking at by excluding the established and needed pedestrian and non-motorized system desired for the wellbeing of our residents, visitors and businesses.

Sincerely,
Stephanie Lesmeister

Stephanie Lesmeister,
President Cooper Landing Chamber of Commerce

ID: 1506 **Source:** Web **Date Submitted:** 4/16/2018
Name: Yvette Galbraith
Organization: Alaska Marketing Consultants

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

To Whom it May Concern

I am writing this letter in concern over the impact the current Cooper Landing Bypass plan will have on our community and its livelihood. I am providing you with a list of our concerns generated by several

members in our community that need to be considered and resolved before this project begins. I also wish to take this time to emphasize my support of a Walkable Cooper Landing, as our residents and visitors of Cooper Landing, AK have made their way through the community along our Safety Path parallel to the Sterling Highway for decades. The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities. To not take this into consideration in the Juneau Alternative Routes current design would be completely negligent on DOT's and HDR Consulting's part. Project planners should reevaluate the following considerations: ·

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.

- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are

frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.

- It cannot be overstated that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
- Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
- Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Thank you for taking our comments into consideration when the Kenai National Wildlife Refuge is in negotiation with the Alaska DOT, HDR Consultants and the other parties working on the Sterling Highway MP 45-60 Project. We look forward to reevaluating the proposed plan to make sure that the accommodation for travel facilities for motorized traffic does not add more to impact our community is already looking at by excluding the established and needed pedestrian and non-motorized system desired for the well being of our residents, visitors and businesses.

Sincerely,
Yvette Rooney Galbraith
Owner, Alaska Marketing Consultants, Inc.

ID: 1507 **Source:** Web **Date Submitted:** 4/16/2018
Name: Gary Galbraith
Organization: Upper Kenai Cabins

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

To Whom it May Concern

I am writing this letter in concern over the impact the current Cooper Landing Bypass plan will have on our community and its livelihood. I am providing you with a list of our concerns generated by several members in our community that need to be considered and resolved before this project begins. I also wish to take this time to emphasize my support of a Walkable Cooper Landing, as our residents and visitors of Cooper Landing, AK have made their way through the community along our Safety Path parallel to the Sterling Highway for decades. The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities. To not take this into consideration in the Juneau Alternative Routes current design would be completely negligent on DOT's and HDR Consulting's part. Project planners should reevaluate the following considerations: ·

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local

traffic hardships and emergency vehicle access problems.

- It cannot be overstated that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
- Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
- Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Thank you for taking my comments into consideration in the final negotiation between the Alaska DOT, HDR Consultants and the other parties working on the Sterling Highway MP 45-60 Project. I look forward to reevaluating the proposed plan in our community to make sure that the accommodation for travel facilities for motorized traffic does not add more to impact our community is already looking at by excluding the established and needed pedestrian and non-motorized system desired for the well being of our residents, visitors and businesses.

Sincerely, Gary Galbraith
Owner, Upper Kenai Cabins

ID: 1508 **Source:** Web **Date Submitted:** 4/16/2018
Name: Yvette Galbraith
Organization: Alaska Marketing Consultants

-Correction to Previous Comment Sent

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

To Whom it May Concern

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ID: 1509 **Source:** Email **Date Submitted:** 4/16/2018
Name: Terri Marceron **Title:** Forest Supervisor
Organization:

USFS File Code: 1900; 7710
Route To:
Date: April 16, 2018

Subject: Sterling Highway Milepost 45-60 Final Environmental Impact Statement (FEIS) & Final Section 4(f) Evaluation (March 2018)

To: John Lohrey,
Statewide Programs Team Leader
Alaska Division, Federal Highway Administration
P.O. Box 21648

Juneau, AK 99802-1648

Enclosed are our comments on the Sterling Highway MP 45-60 Final Environmental Impact Statement (FEIS) and Final Section 4(/) Evaluation. We appreciate the opportunity to provide comment within this 30-day public comment period. I and my staff attended the Cooper Landing and Anchorage meetings. Based on the FEIS, and public meeting presentations, we provide the following comment:

2002 Chugach Forest Plan Consistency:

The discussion of Forest Plan consistency throughout the FEIS, particularly in Chapters 3 .2 (land use plans) and 3 .22 (wildlife), is confusing, inconsistent, and in some cases, inaccurate or misleading. In section 3.2.3.1, the FEIS states that " ... selection of the No Build Alternative would be consistent with the Chugach National Forest Revised Land and Resource Management Plan (Forest Service 2002a)." This statement is correct. The No Build alternative is also consistent with the brown bear guideline discussed in this chapter and throughout the FEIS. However, in numerous places the FEIS either directly or indirectly suggests that the No Build alternative is not consistent with the brown bear standard or guideline. The No Build alternative is consistent with the Forest Plan and the FEIS should in no way suggest otherwise. The FEIS must not pose irrelevant hypothetical situations, such as what would happen if the highway was to be newly constructed in its current location, because these have nothing to do with the actual project alternatives and only confuse the reader as to effects.

During our cooperating agency review in December 2017, we commented on several inaccuracies pertaining to Forest Plan consistency. While these sections have been edited, they still do not accurately interpret the Plan as it relates to this project. The entire FEIS should be revisited in terms of application of the Forest Plan to ensure consistency and accuracy. We suggest an appendix to the ROD specific to forest plan consistency for all alternatives and associated effects. Please coordinate with Kori Marchowsky to ensure the FEIS analysis is complete as it will serve as the analysis referenced for any forest plan amendment.

RESPONSE: HDR has coordinated with Kori Marchowsky on the discrepancies identified. It appears that the Final EIS has changes related to the consistency of the No Build Alternative with respect to the bear management area in the locations you had identified, but those changes were not carried through to Section 3.2.4 (p. 3-66, third paragraph, under discussion of the Roadless Rule), which states: “None of the alternatives is completely consistent with the specific management prescriptions of the Forest Plan. The prime example, as discussed above in Section 3.2.3.2., is that none of the build alternatives (or the existing highway) meets a Forest Plan standard for separation from identified brown bear management areas.” DOT&PF and FHWA understand that the Standard in question applies only to “new road construction,” as is quoted in Section 3.2.3. It in no way applies to the existing highway, which is the No Build Alternative. This ROD acknowledges the correction by the Forest Service (the agency with jurisdiction over the plan). Other locations in the Final EIS similarly may imply that the Standard applies to the existing highway or No Build Alternative. It is FHWA’s intention in this ROD to clarify that nowhere in its pages should the Final EIS be construed to imply the No Build is inconsistent with the Standard, and that this potential for confusion in no way influenced the decision in the ROD. Section V of the ROD clarifies this position.

Regarding your suggestion of an appendix to the ROD, it is the intention that, wherever comments have identified errors or needs for clarification on a given issue, the corrections and clarifications apply throughout the Final EIS. Documentation of the corrections occurs in these responses to comments and/or the ROD.

Resurrection Pass National Recreation Trail (Conservation System Unit (CSU) under ANILCA):

The Resurrection Pass National Recreation Trail is a CSU under ANILCA. We have confirmed with our Office of General Counsel that this trail fits squarely within the plain language of Section 102(4) of ANILCA based on the trail designated as a National Recreation Trail, a unit of the National Trails System, in 1979. Congress included existing units of the National Trails System in the definition of a CSU in ANILCA in 1980. FHWA staff has stated that from the perspective of the EIS the trail will be treated as a CSU and be considered a significant Section 4(f) resource. However, the FEIS contains language that questions or implies that this trail may not be a CSU. For example, in Section 3.2.1.4 (p. 3- 36), it states "Forest Service legal counsel reportedly has prepared a legal opinion stating the trail is a CSU."

We have stated our legal opinion as noted above. Section 4.2.4.5 (p. 4-19) is misleading and inaccurate and needs to be corrected. All references to the Resurrection Pass National Recreation Trail in the FEIS and ROD should clearly note it is a CSU under ANILCA.

RESPONSE: It is FHWA's intent with the Final EIS language to reflect that there is a legal difference of opinion between the Forest Service and the State of Alaska. As indicated in the EIS, FHWA defers to the Forest Service as another federal agency to make this call, and has made sure the Resurrection Pass Trail was evaluated as a Conservation System Unit (CSU) under the Alaska National Interest Lands Conservation Act (ANILCA). FHWA's Final EIS analysis reflects the trail's CSU status, but also discloses the difference in legal opinion between the Forest Service and the State of Alaska.

Wildlife Movement Mitigation:

The system of wildlife crossings outlined in the Final EIS are inadequate to meet the wildlife movement and human safety objectives of the project. Investigation and modeling of both wildlife movements and collisions became available to the Forest Service late in 2017. Release of that information led to a meeting in December 201 7. At that meeting multiple agencies discussed a system including two overpasses and two underpasses along with a range of other measures as mitigation for wildlife movement on the Juneau Creek Alternative. Forest Service comments were based on that system and the details in the Cooperating Agency Draft FEIS (November 2017). The FEIS outlines a far less effective system. One of the overpasses (#23 in the Juneau Creek Alternative) was eliminated and replaced by an ineffective underpass. The FEIS preferred alternative (Juneau Creek) describes three marginally designed wildlife underpasses and one dedicated overpass over the 15-mile project area:

- 18' H x 23' W culvert under 3-lanes (~MP50, #9)
- 130' wide overpass over 3-lanes (~MP54, #20);
- 18' H x 23' W culvert under 3 lanes (MP: 56.3, #22)
- 15' H x 23' W culvert under 2-lanes (MP 57.2, #24)

In our previous comments (January 2017, December 2017) we emphasized that underpass effectiveness is determined, in part, by the relationship between the length of an underpass and its height & width.

Furthermore, you cite the FHWA Wildlife Crossing Structure Handbook (2011) as your guide to wildlife movement mitigation; it also emphasizes the importance of avoiding a 'tunnel'. Three of the four wildlife passage structures in the preferred alternative fail to incorporate these relationships and therefore may or will not serve the intent of facilitating wildlife movement and improving human safety (reducing collisions).

The system for wildlife passage should be modified as follows:

RESPONSE: In the November 2017 version of the Wildlife Crossings Analysis and Recommendations report distributed to the cooperating agencies, there were recommendations for wildlife structure types and locations, including three sites for wildlife overpass structures. Two of these wildlife overpasses were recommended for construction as part of the Juneau Creek Alternative. As the recommendations circulated at DOT&PF, a serious concern was raised about any such structure and its inability to accommodate oversize loads on the Sterling Highway, as there is no alternate route around the structure.

Based on this concern, the Final EIS retained one wildlife overpass for the Juneau Creek Alternative. The retained location is site #20 in the November 2017 wildlife report. Site #20 is on the segment built on a new alignment, and in this area the existing or “old” Sterling Highway would continue to exist. Oversize vehicles that might have a problem with the roadway tunnel could use the old route. The other overpass site (#23 for the Juneau Creek Alternative) is on the common alignment where there would be no other route around this roadway tunnel. Instead of the wildlife overpass, a wildlife underpass at site #22 in the same area is recommended. This underpass location appears to be equal or better in terms of serving wildlife movements. The Final EIS states a commitment to examining the potential for constructing this underpass with a wider opening than the typical 23 to 32 feet indicated in the wildlife report (potential options include constructing a bridge for the highway with an opening of 32 feet or greater, or constructing two oversize culverts in this area if topography allows). The height of the opening will be at least 18 feet.

The dedicated wildlife underpasses #9, #22, and #24 have not changed and remain as agreed to during consultation. They are no less effective than originally proposed and reflect the locations identified by the modeling and field validation effort. The dimensions given above are minimums, and the EIS does not specify that they would be “culverts.” The structure type has not been selected, and will be determined during design. The EIS states commitments to work with wildlife agencies to refine wildlife crossing locations and designs during the final design process.

In response to comments from the wildlife agencies and the public on the Final EIS, a fourth dedicated wildlife underpass is added at site #10 identified in Appendix I (Wildlife Crossings Analysis and Recommendations) of the Final EIS.

MP50 (#9) 18' H x 23' W underpass: This underpass occurs under 3 lanes just west of the point where the road transitions from 2 to 3 lanes. As an extremely long tunnel, it is a compromised structure. A bridge should be installed to assure wildlife movement.

RESPONSE: Bridges as wildlife crossing structures are one of the options specified in Appendix I of the EIS that could be implemented if deemed cost effective. The exact size and shape of the wildlife crossings and the exact location of passing lanes is to be determined during final design, as stated in the EIS. DOT&PF and FHWA are committed to working with the wildlife agencies to provide useable, dedicated wildlife crossings and will consider refinement to the design to minimize the distance the wildlife need to cross (by shifting the taper or using wing walls or other design techniques).

MP54 (#20) 130' wide overpass: The FEIS suggests this structure may be compromised in the future by ingress/egress from the highway. This overpass represents substantial value to human safety and wildlife movement. Hence, concrete, permanent steps should be taken, and committed to in the EIS, to prohibit actions that would diminish the value of the wildlife structure. No rights of way should be granted on the highway that compromise any of the wildlife mitigation structures.

RESPONSE: Analysis of potential access to State Management Unit 395 directly from the Juneau Creek alternatives was undertaken at the request of the Forest Service. DOT&PF and FHWA have consistently stated a preference that access should come from the existing highway, which in the future would be a collector road or minor arterial more suited to providing local access. DOT&PF and FHWA believe the decision on whether to grant access via ramps will primarily lie with the Forest Service because the Forest Service intends to retain an easement for the forest roads that pass through Unit 395. Thus, to obtain rights to access those roads, the Kenai Peninsula Borough (Borough) would require a decision by the Forest Service, requiring additional National Environmental Policy Act (NEPA) evaluation (either a separate document or tiered from this document). The Sterling Highway MP 45–60 Final EIS evaluates both options (access via ramps and access via the old highway) as reasonably foreseeable, but leaves the potential open for either choice. DOT&PF and FHWA will work with the Forest Service if/when an access request is made by the Borough. Given the public expense of putting in the wildlife overpass, DOT&PF and FHWA are committed to maintaining its functionality for wildlife use and that will be a key consideration, if and when the Borough requests access.

MP56.3 (#22) 18' H x 23' W underpass: This underpass occurs under 3 lanes resulting in a compromised structure.

We recommend retaining the overpass (#23) described in the Cooperating Agency Draft FEIS (November 2017) and designing it to accommodate oversize trucks. Otherwise, a bridge should be installed to assure wildlife movement.

RESPONSE: Bridges as wildlife crossing structures are one of the options specified in Appendix I of the EIS that could be implemented if deemed cost effective. DOT&PF and FHWA also have committed to re-examining passing lanes during design to adjust where they occur to minimize the crossing width for wildlife. It is possible this location could be narrowed to improve the wildlife crossing. As mentioned above, instead of the wildlife overpass, a wildlife underpass at site #22 in the same area is recommended. This underpass location appears to be equal or better in terms of serving wildlife movements. The Final EIS states a commitment to examining the potential for constructing this underpass with a wider opening than the typical 23 to 32 feet indicated in the wildlife report (potential options include constructing a bridge for the highway with an opening of 32 feet or greater, or constructing two oversize culverts in this area if topography allows). The height of the opening will be at least 18 feet.

MP57 (#24) 15' H x 23' W underpass: This underpass occurs under 2 lanes of highway. The limited height compromises this underpass. Increase to 18' H, to accommodate moose.

RESPONSE: It is DOT&PF and FHWA’s intention to accommodate 18-foot clearances in wildlife underpasses where possible. At this location (Fuller Creek crossing), preliminary design data indicates it is not possible without affecting access to the trailhead for Fuller Lakes Trail, which FHWA has determined is a protected resource under Section 4(f). The proposed crossing location was identified as primarily a bear crossing location, which may not need the full 18 feet. However, DOT&PF and FHWA are committed to refining the location and design (heights and structure types) of wildlife crossings during final design. With final design survey data, it may be possible to raise the height of the crossing.

Even assuming that the four wildlife structures are modified to assure wildlife movement as outlined above, the system for wildlife passage along the highway remains inadequate (see FHWA Wildlife Crossing Structure Handbook (2011) which recommends far more crossings along a 15 mi stretch of highway). The following two structures should be added to address clear shortcomings in the system for wildlife crossings.

RESPONSE: The FHWA *Wildlife Crossing Handbook* provides general guidance on the type and number of wildlife crossing structures. For this project, FHWA commissioned a specific study (designed with the oversight and input of wildlife biologists from the USFWS, Forest Service, and ADF&G). That study is specific to this project area and includes analysis of the terrain, habitat, and development patterns, and was conducted on the six wildlife species identified by those agencies as important in the project corridor. The mitigation proposal was the direct result of the study to maintain the movement patterns identified in this project area.

Other than a change in structure type (from an overpass to underpass related to site #23), all other recommendations, which were coordinated with the Forest Service and other wildlife agencies, have been incorporated as commitments in the Final EIS.

Bean Creek Underpass: Convert the water culvert at crossing #10 to a full-dimension wildlife underpass or bridge.

Initially the long-span bridge over Juneau Creek appeared to offer highly functional wildlife passage along an important portion of the highway. The new highway location will attract and increase visitor use different from the existing highway. Based on the highway location, the routing of Resurrection and Bean Creek Trails and the location of the trailhead for safety of trail users will result in increased human use near Juneau Creek immediately upstream of the proposed bridge. Human use of the area could affect wildlife passage under the bridge. The water culvert currently designed at Bean Creek (location # 10, Map 13 in Appendix I of the FEIS where Bean Creek flows under the new highway alignment), immediately east of the Juneau Bridge, should be enlarged and engineered to function as an effective wildlife underpass (bridge or very wide underpass). This structure will provide passage for wildlife in a critical portion of the project area and is separate from the visitor use on the trails and new trailhead. We request that design review for this underpass include our wildlife and recreation staff.

RESPONSE: DOT&PF and FHWA will provide a dedicated wildlife underpass at site #10 as requested. As with all the wildlife crossings, refinement with the wildlife agencies of the location and design of the crossings is a commitment in the EIS.

Eastern wildlife movement structure: Construct an overpass for wildlife movement at the most effective location east of the MP 45 to mitigate the extensive stretch of highway blocking animal movement from MP 50 to MP 45.

An overpass near MP 43 would effectively move wildlife into a riparian area, away from 'builtup' human structures. This mitigation is critical given the 5 mile stretch of highway in the project area (some on very steep hillsides) blocking north-south movement of wildlife. While the overpass is out of the project area it is a critical component of the project due to the substantial barrier to wildlife movement posed by the eastern 5 miles of highway - a stretch where we would expect 2 wildlife structures if there were not geographic and human barriers.

RESPONSE: Based on the analysis provided in Appendix I, the area from MP 45 to 50 is not anticipated to experience high wildlife usage, or would funnel wildlife into Cooper Landing. The crossing might work for Dall sheep and moose at certain times of the year, but were not recommended because of potential human/wildlife conflicts. The eastern area has been previously discussed. However, it is outside the project area. In addition, a wildlife overpass in this location presents the same issues as a wildlife overpass near the western end—there is no alternate route for oversize vehicles. See the response

immediately below.

The six wildlife structures outlined above represent a minimum system to facilitate wildlife movement and address human safety along the 15 mile project. The FHWA Wildlife Crossing Structure Handbook (2011) provides guidelines for the number of large mammal crossings deemed necessary to effectively facilitate movement; on average every 1.2 miles. Between Draft and Final, the preferred alternative moved from 2 underpasses, 2 overpasses, and a bridge (Juneau Cr) to 3 (relatively ineffective) underpasses, 1 overpass, and knowledge that the bridge represents a compromised wildlife movement structure. The system of 6 structures described above represent necessary improvements in response to the wildlife mitigation described in the FEIS.

RESPONSE: The highway currently has no wildlife crossing structures. The overall traffic volume would not change under the Juneau Creek Alternative, and the volume would be split between two roads over approximately 10 miles in the project area. Therefore, the new highway would carry approximately 70 percent of today's highway traffic, and that traffic would have improved site distance and maneuvering room. This will create an improved condition for crossing the highway. As mentioned above, the FHWA *Wildlife Crossing Structure Handbook* provides guidelines. Based on the specific modeling completed for this project, wildlife crossing structures are not warranted every 1.2 miles. The modeling, camera work, and crash data suggests that Kenai Lake, the community of Cooper Landing, and the steep terrain limit where animal movements occur. DOT&PF and FHWA have committed to unprecedented wildlife mitigation measures based on the specific results of the study, and are committed to working with the wildlife agencies to ensure they are placed and designed to be as effective as possible. A fourth wildlife underpass has been added for a total of five major crossing structures. FWHA and DOT&PF respectfully disagree that more crossings are needed to adequately mitigate for impacts to wildlife movement.

Bean Creek Trail - Wildlife mitigation

In mid-December, I shared that our wildlife and recreation staff were still discussing the resulting 200- foot buffer on the east side of the creek under the bridge and the relationship to brown bear movement migration and the Bean Creek trail. Specifically a pedestrian tube for Bean Creek trail users was discussed in December which would leave the east side of Juneau Creek and area under the bridge to function more effectively as a wildlife passage area. Per your comments under Response 9 of FWHA's March 2018 letter, ADOT&PF is not intending to add another pedestrian tube to align the Bean Creek Trail under the highway and away from the bridge abutment. On page 4-87 (Section 4.6.4.1) of the FEIS, the only mitigation to be applied is to align the Bean Creek trail reroute as close to the bridge abutment as possible leaving room for wildlife crossing under the bridge.

After considering the current recreation use of Bean Creek Trail and how recreation use might change, we are not recommending a pedestrian tube to route Bean Creek Trail users through. With the highway and new bridge, we anticipate that there will be a substantial increase in day use to visit the Juneau Creek Falls including the opportunity to do a short day hike loop that consists of traveling north on Resurrection Pass National Recreation Trail from the new trailhead, crossing Juneau Creek on the trail bridge, and then traveling south on Bean Creek to the new highway, crossing Juneau Creek on the highway bridge, and back to the new trailhead. A pedestrian tube wouldn't address the Bean Creek trail use north of the new highway alignment. Bean Creek Trail use from current trail head and subdivision may see a decrease in use because visitors will now have a new trailhead higher in elevation accessing the Resurrection Pass National Recreation Trail that is closer to cabins and lakes and Juneau Creek Falls. Residents who live in the subdivision or have a purpose to use the Bean Creek Trail more locally will likely be using this trail up to the new highway.

RESPONSE: DOT&PF and FHWA believe these comments align with what is presented in the EIS. The comments are noted. A wildlife underpass has been added near the headwaters of Bean Creek (site #10 in Appendix I) to provide additional separation between people and wildlife, while providing an additional option for wildlife crossing in this portion of the Juneau Creek Alternative.

Roadless area language regarding recreation cabins and suitability of recommending or designating IRA's as wilderness.

This wording has not been changed as requested. Section 3.2.4.4 (Page 3-62) still has inaccurate language for G-South alternative implying that IRA areas that have recreation cabins would not be suitable for recommending for wilderness designation. Response 27 in the FWHA's March 2018 indicates the language has been changed.

RESPONSE: It appears this issue was addressed in one location but missed in this location. The intention is that the text would not mention presence of public use cabins as an impediment to Wilderness designation. This has been added to Section V of the ROD.

Acreage for Bean Creek Trail as Section 4{f) property

Table 4.1-1 lists Bean Creek trail (recreation only) for 4(f) purposes as the entire 31 acres rather than just the 6 acres as noted in the footnote. This was re-emphasized in the Response 30 in FWHA's March 2018 letter. The table states that G-South is the only alternative that would affect Bean Creek recreation portion. If the whole trail (31- acres) is considered a recreation trail under section 4(f), then both Juneau Creek Alternatives do affect a small section of Bean Creek Trail where the new highway alignments cross it near Juneau Creek. The information in Response 30 also conflicts with Table 4.5-1 information which only shows the "new" nonhistoric portion of Bean Creek considered for 4(f) consideration and only G-South alternative affecting it.

RESPONSE: For the purpose of understanding Section 4(f) protection, it is important to note there is not greater or less protection afforded a “recreation area” Section 4(f) property versus an “historic site” Section 4(f) property. Both are equally protected. So the entire Bean Creek Trail—including its historic-only segment, its recreation-only segment, and its overlapping historic and recreation segment—is protected under Section 4(f). The Section 4(f) Evaluation (Chapter 4 of the EIS) does not distinguish except to indicate why certain trail segments are subject to Section 4(f) protection. The Section 4(f) Evaluation has, since the beginning, documented that the G South Alternative and the two Juneau Creek alternatives have a Section 4(f) use of the trail.

To fully understand the tables, it may help to refer to Map 4-5, which labels the historic and recreation segments, and Map 4-6 in the Final EIS.

Because of the continued confusion on this topic, GIS analysts re-examined this area, with results as indicated in the following table. The corridor used in the Section 4(f) Evaluation for width of the trail ‘property’ was 100 feet. There are three trail segments in question, one short segment that is recreation-trail only, one short segment that is historic-trail only, and one long segment in which recreation values and historic values overlap. Based on these land areas:

- The historic-only segment of the trail terminating at the edge of private property west of Bean Creek is 1.43 acres.
- The recreation-only segment terminating at the extension of Slaughter Ridge Road is 5.93 acres.

- The combined historic-and-recreation segment from the junction of the other two segments north to the Resurrection Pass Trail is 24.44 acres.
- The totals are 31.81 acres for all three segments protected under Section 4(f), 30.37 acres for the two recreation segments, and 25.87 acres for the two historic segments. Note that these total do not add to the total due to the overlap of recreation and historic designations.

The table below indicates the Section 4(f) use of these segments (overlap of anticipated highway right-of-way and trail corridor). Regarding the two Section 4(f) Evaluation tables mentioned in the comment, these acreages are rounded differently but are the same totals. Note that the Bean Creek Trail is listed twice in the Section 4(f) Evaluation tables, once under Recreation Area and once under Historic Property.

The table below and clarifying language has been added to Section V of the ROD for clarification.

Acreage of Use of Bean Creek Trail by the Build Alternatives

	Cooper Cr. Alt.	G South Alt.	Two Juneau Cr. Alts	Notes
Historic-only trail segment	0.00	0.00	0.00	Trail segment terminating at neighborhood/ private property
Recreation-only trail segment	0.00	2.41	0.00	Trail segment terminating at extension of Slaughter Ridge Rd.
Historic & recreation trail segment	0.00	0.70	1.06	Trail segment 'terminating' at Resurrection Pass Trail*
Totals	**0.00**	**3.11**	**1.06**	
* The trail continues but is called Resurrection Pass Trail. From the junction northward, the Resurrection Pass Trail also is subject to Section 4(f) protections for as both an historic site and a recreation area.				

Existing highway improved for pedestrians and bicyclists

The Forest Service still disagrees with FWHA and DOT&PF conclusions as stated in the FEIS concerning removal of 70% of traffic on the existing alignment will improve the existing highway for bicyclists and pedestrians. Your Response 34 in the March 2018 letter to us states the following: "The reduction of traffic will make it safer for bikes and pedestrians. Moreover, the remaining traffic would be largely "local" traffic, meaning it is vehicles traveling between local destinations. This traffic would be less likely to be in a hurry and less likely to be trying to speed through town."

Section 3.8.2.2 addresses our concerns about vehicles (including large vehicles remaining on the old highway) but still concludes that "The road would function as a local road- a winding, two-lane road with relatively low speed limits suitable for providing access to local destinations ... With less traffic on the old highway the overall experience of recreation drivers, pedestrians, and bicyclists traveling through the area would be improved".

RESPONSE: DOT&PF and FHWA note your concern and believe the Final EIS fully discloses the potential effects. The sentence immediately following the quoted sentence reads, “However, the traffic, while considerably less in volume, would still include large RVs and vehicles with boat trailers, allowing no additional room for pedestrian or bikers using the highway to connect points within the community.” This directly speaks to the concern raised in the Forest Service comment.

The traffic remaining in town in the summer months would still include anglers and other recreation visitors in large RV's and vehicles hauling boats who will need to drive through town to access the Kenai River, Forest Service campgrounds and trailheads, and local accommodations and businesses. If the speed limit doesn't change, people will drive the same speeds they do today to access area amenities. There are no proposed changes to the existing highway regarding width of shoulders and in one location, the proposed alignment would eliminate the informal safety path that exists on the north side of the highway near Sunrise. Thirty percent (30%) of anticipated vehicular use is still a lot of traffic along a narrow winding road (visually shown in the Executive Summary page 5-8, FEIS pages 1-10, 1-15, 3-127).

RESPONSE: It was DOT&PF and FHWA’s intention to express the anticipated improvement in safety based on the reduced traffic volume (70 percent less traffic will be using the same roadway as bicyclists and pedestrians) but also to acknowledge the lack of improvement of physical characteristics of the “old” highway. The segment of existing Sterling Highway left under any of the alternatives would no longer be part of the NHS, and would be reclassified to a lower functional classification, likely as minor arterial or major collector. That means the road would provide less of a statewide function and would be intended to serve more localized trips, characterized by slower speeds which are safer for accessing adjacent properties. Removing through-traffic (70 percent) drivers from the "old" highway could leave the “old” highway a candidate for a lower speed limit, and DOT&PF has committed to studying that potential when the new highway is open. See also response immediately above.

Regarding the “safety trail,” see response immediately below.

Community residents at the public meeting in Cooper Landing in March 2018 expressed their concerns with the safety of bicyclists and pedestrians on the existing highway without any changes to the road width and speed of traffic. They also expressed other concerns about impacts to their community through increased noise and visual impacts to local residents. A potential way to compensate for these impacts to the community would be for ADOT&PF to work with the community on how to integrate solutions for a walkable community with the preferred alternative, particularly near Sunrise where the Juneau Creek Alternative leaves the existing alignment and would obliterate the safety pathway and the connectivity to residents along the Quartz Creek road. Mitigation of this nature aligns where the impacts to the community are occurring.

RESPONSE: DOT&PF and FHWA have committed in the ROD to providing a separated roadside path along the Juneau Creek Alternative between Quartz Creek Road and the intersection of the “old” Highway, connecting the existing trail into Cooper Landing. This is a mitigation measure that would apply to all alternatives.

Pedestrian Walkways on Snow River Highway Bridges

In the Cooper Landing public meeting held in March 2018, community members raised concern about the proposed mitigation to build connecting pedestrian lanes on the Snow River bridges as compensatory mitigation for impacts to the Resurrection Pass National Recreation Trail.

They mentioned they would like to see mitigation in the form of improving the walkable community within Cooper Landing. In April of 2009, the Forest Service discussed mitigation (a pedestrian trail along the highway leading from Resurrection Pass National Recreation Trail to Alaska Wildland Adventures) internally and with HDR/DOT&PF. It was determined that mitigation addressing impacts to the Resurrection Pass National Recreation Trail relate to another long-distance national trail which is why work on the Iditarod National Historic Trail (Snow River bridges) was identified. The impact to the Resurrection Pass National Recreation Trail is not an impact to the Cooper Landing Community. This explanation was clarified during the March 2018 public meeting by the HDR representative who was answering the community members' questions.

RESPONSE: Comments noted. DOT&PF and FHWA concur.

One of the statements made by HDR during the March 2018 Cooper Landing public meeting indicated that the Snow River bridges would be stand-alone trail bridges built by the DOT and maintained by the Forest Service. This statement is incorrect. We concur that the language in the FEIS in Section 4.6.4.1 (page 4-90), Section 4.8.2.3 (page 4-126), and text on Map 4-14 is accurate indicating the mitigation would be pedestrian walkways connected to the highway bridges.

RESPONSE: Comments noted. DOT&PF and FHWA concur.

Juneau Creek alternatives: Use of the New Trailhead for Resurrection Pass National Recreation Trail
In the March 2018 meeting in Cooper Landing, the HDR representative answered questions from the Cooper Landing community regarding the new trailhead and intended uses. He stated the trailhead would be for day use only. We would like to clarify this point. We have discussed uses of the proposed trailhead since 2009 with FWHA/DOT&PF/HDR and it would be managed for all user groups including those visitors would be staying overnight along the trail system. Camping at the trailhead itself would be prohibited but visitors would be able to leave their cars at the trailhead overnight while using the trail system.

RESPONSE: Comment noted: “Camping at the trailhead itself would be prohibited but visitors would be able to leave their cars at the trailhead overnight while using the trail system.” The trailhead would be a Forest Service trailhead that would be managed as Forest Service determines is best.

Interpretive signing at new trailhead for Resurrection Pass National Recreation Trail
In Section 4.6.4.1 (page 4-89), interpretive signing concerning mining history is planned to be placed at the new trailhead. As indicated in our letter dated February 10, 2017, mining history would not be the most appropriate subject to be discussed at this location as mining did not occur in this vicinity or along the trail. We could work with SHPO's office and the community of Cooper Landing to determine the best location for this type of interpretive messaging. This same language is repeated in Section 4.6.5.1 (page 4-94) for the proposed trailhead for Bean Creek Trail along the G-South alternative route and our concerns and solution would be the same as for Section 4.6.4.1 above.

RESPONSE: The Forest Service has signed the Section 106 Programmatic Agreement that specifies in slightly more detail (see page 10) the intended interpretive displays related to the Bean Creek Trail. The EIS was meant to reflect the terms of the Programmatic Agreement, which states that one sign would be located at the new trailhead and one sign along the Bean Creek Trail would be located where the Forest Service felt it was best suited. It is DOT&PF and FHWA’s understanding that the Bean Creek Trail (and Resurrection Pass Trail from the Bean Creek Trail junction northward) is an historic trail determined

eligible for the National Register of Historic Places because of the mining history of the trail. This was the intent of the signs—to interpret the reason the trail is considered historic. Given that most of the historic trail today is called the Resurrection Pass Trail, it seems reasonable to interpret the history of the trail at the new trailhead. DOT&PF and FHWA agree that the subject/wording and final location will be determined through consultation with the signatories of the Programmatic Agreement.

Cross-walk the FEIS & 4(f) Evaluation for edit consistency and accuracy

In reviewing our comments, please cross-walk them throughout the FEIS and appendices to ensure consistency where the same concern or comment may be applicable in multiple locations.

RESPONSE: FHWA is not republishing the Final EIS. It is the intention that, wherever comments have identified errors or needs for clarification on a given issue, the corrections and clarifications apply throughout the Final EIS. Documentation of the corrections occurs in these responses to comments and/or the ROD.

We continue to recognize the significance and need of this project and submit these comments in the spirit and intent as a cooperating agency. If you have any questions, please contact me by phone at (907) 743-9525 or via email tmarceron@fs.fed.us. In my absence, Griffith Berg continues to be the forest point of contact and can reached at (907) 743-9442 or via email gqberg@fs.fed.us.

TERRI MARCERON
Forest Supervisor

CC: Sharon LaBrecque, Francisco Sanchez, Griffith Berg, Deyna Kuntzsch, Kori Marchowsky, Kelly Chase Veach, Karen Kromrey, John Kinsner, Greg Hayward, Amy Thomas, Chad Van Ormer, James King, Andy Loranger, Lynnda Kahn - USFWS Andy Mitzel - ACE

ID: 1510 **Source:** Web **Date Submitted:** 4/16/2018
Name: Heather Pearson
Organization: Kenai River Float-n-Fish, LLC

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

I am writing you on behalf of our Cooper Landing business, Kenai River Float-n-Fish, as well as our family, year-round residents of Cooper Landing. I have some comments on the Final Environmental Impact Statement for the Sterling Highway MP 45-60 Project that I would like to share with you. The project as it stands in current design needs some improvements in planning to help mitigate serious flaws that could have a negative impact to both our business and family. These suggestions are intended to address our concerns regarding safety, ease of use, and impacts to current uses of the highway corridor by our pedestrian community users (visitors, residents, and children). We appreciate your consideration of the following:

- Current design of intersections at the two junctions of the bypass to the current Sterling Hwy is of concern. We foresee safety issues and potential bottlenecks here especially by motorists traveling to the Sportsman’s boat launch/Kenai-Russian River ferry. Making a left turn across 55mph traffic, especially

while towing a vessel, presents unnecessary danger at this interchange. Also please take into account that during June and July traffic is frequently backed up on the Sterling Hwy. with vehicles trying to get into Sportsman's. This traffic could potentially back up all the way to the bypass.

- The Sterling Hwy. safety path is a very important resource to the pedestrians in our community. As it path is currently used, people can freely walk between the Quartz Creek Rd. neighborhood to the business areas of Cooper Landing. The current design does not provide a safe pedestrian access or crossing for the safety path near Quartz Creek Rd. This is a negative impact to the current and historic use of the highway corridor and also not aligned with the responsibility of the transportation agency to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into transportation systems. The mitigation plans for the project are inappropriate. As the community of Cooper Landing will experience the greatest impacts by the project, Cooper Landing should receive the benefits of mitigation. The current proposed mitigation measures are set to occur in a watershed that is a great distance from the project area. Better plans for project mitigation would include upgrades to the existing safety path in Cooper Landing, including in the project design a pedestrian/bicycling path along the bypass road, and connecting these and any other trails bisected/impacted by the project (Bean Creek Trail, Resurrection Pass Trail).

- Speed limit should be reduced on the current Sterling Highway from 45mph to 35mph from MP 45-47, 35mph to 30mph from MP 47-51, and 45/55mph to 35mph from MP 51 all the way to the junction with the bypass road. This would greatly increase the safety for all pedestrians and bicyclists in Cooper Landing, would increase the enjoyment level for all the scenic drivers who could slow down and enjoy the sightseeing, and would also provide increased safety for trucks delivering goods to Cooper Landing businesses.

RESPONSE: Part of the reason to propose alternatives that go around the community is to retain the low speed limit and reduce the traffic volume through the community, while providing for safer and more efficient regional traffic. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway. The segment of existing Sterling Highway left under any of the alternatives would no longer be part of the NHS, and would be reclassified to a lower functional classification, likely as minor arterial or major collector. That means the road would provide less of a statewide function and would be intended to serve more localized trips, characterized by slower speeds, which are safer for accessing adjacent properties. Removing through-traffic drivers from the "old" highway could leave the "old" highway a candidate for a lower speed limit.

Thank you for the opportunity to provide comment on the Sterling Highway MP 45-60 project.

Warm regards,
Heather Pearson

ID: 1512 **Source:** Email **Date Submitted:** 4/13/2018
Name: Chris Degernes
Organization:

Chris Degernes

PO Box 683
Cooper Landing, AK 99572

April 13, 2018

Brian Elliott,
Environmental Manager
DOT&PF Central Region
P.O. Box 196900
Anchorage, AK 99519-6900

Re: Sterling Highway MP 45-60 Project

Dear Mr. Elliott:
Please accept the following comments on the Final EIS for the Sterling Highway MP 45-60 Project. I have been involved in this project's discussion for over 30 years, first in my role as Park Superintendent and later Deputy Director for the Alaska Division of Parks and Outdoor Recreation, and now as a retired resident of Cooper Landing. I have long felt that the best alternative was one that took the major traffic well away from the Kenai River, thereby reducing the possibility of a catastrophic impact from a chemical spill along the highway. I support the preferred alternative chosen as the Juneau Creek Alternative and am glad that this is our choice!!

RESPONSE: Comment noted.

I have some suggestions for mitigation of the impacts on the community of Cooper Landing. This community will be heavily impacted by the relocation of the Sterling Highway to the new bypass, both in positive and negative aspects. Of course, the positive benefits will be to reduce the traffic through our congested, narrow valley and move most of the traffic away from the vulnerable Kenai River. Negative impacts, however, will also occur to recreational trails in our community and to businesses who depend upon highway traffic.

While the Resurrection Pass Trail is the most obvious trail that is going to be impacted, other local trails such as the Slaughter Ridge Trail, Coyote Notch Trail and Bean Creek Trail will also be impacted by the highway project. Providing some reasonable mitigation for the impacts on these trails should be included, and frankly, the proposed mitigation of a pedestrian bridge over the Snow River for the Iditarod National Historical Trail is insufficient for the level of impacts. This community desires mitigation to the recreational impacts that will occur in our valley, to be in our valley. There is a good template of ideas within the Cooper Landing Walkable Community Project Plan - ideas for providing basic and safe walkways along the existing Sterling Highway would go a long way in mitigating the impacts on our community. These pedestrian walkways would allow local residents and visitor to access a variety of trails and recreational amenities plus businesses who provide services, on foot and at a slower pace.

RESPONSE: DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway. The proposed mitigation is specific to the Resurrection Pass Trail and was proposed and coordinated with the Forest Service as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation to local community trails.

This could have the result of improving the economy of Cooper Landing by turning this area into a very walkable, accessible and desirable recreational center.

I am also concerned that our locally used Safety Path (built in the late 1990s by the local DOT &PF Maintenance crew with state CIP funding) will be lost or isolated by the project. Please ensure that we will continue to be able to safely walk between the Quartz Creek Road and the center of town near Wildman's. Portions of the Safety Path appear to be cut off in the proposed highway relocation.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway,- pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

Any further improvements or pathway projects on the "old" Sterling Highway would, however, need to be developed under a separate project.

Overall, I very much support this project and hope that we won't have to see another 30-40 years go by without a solution being implemented. I strongly urge you to work with the local community which does not have an agency speaking for it in developing reasonable mitigation for the impacts that will occur. Potential groups who may be able to offer suggestions include the Cooper Landing Walkable Community Project group, the Cooper Landing Community Club, and the Cooper Landing Advisory Planning Commission.

Thank you for taking my comments. I look forward to seeing this project hit the ground at long last!

Sincerely,
Chris Degernes
Jaeger06@hotmail.com
907-595-2030

ID: 1513 **Source:** Comment Form **Date Submitted:** 4/13/2018
Name: Candy Goldstein
Organization:

I have been a resident of Alaska and the Kenai Peninsula for 38 years. I have been driving the Sterling Highway thru Cooper Landing for that many years. Yes, the Sterling Highway is windy, with driveways and a limited shoulder. The solution is to lower the speed limit ad accept that it is slow going for a few miles. Also no parking on the shoulder.

I attended the public open house. I am appalled that we are even considering destroying the wetland habitat and bear/moose habitat for a new highway (55 mph) with a 5.9% grade to the tune of 280 million dollars. You will not alleviate the congestion because in the summer, during the red run, dip net and hiking/camping season people flock to Cooper Landing to see the river. 70% of the traffic is not thru traffic. Juneau Falls will be impacted because now many more people will be able to visit the falls because the hike will be much shorter and avoid the elevation.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm. Traffic congestion on NHS alignment will be alleviated because traffic accessing the local destination you mention will be on the old highway. The segment of existing Sterling Highway left under any of the alternatives would no longer be part of the NHS, and would be reclassified to a lower functional classification, likely as minor arterial or major collector. That means the road would provide less of a statewide function and would be intended to serve more localized trips, characterized by slower speeds, which are safer for (and intended for) accessing adjacent properties.

After the meeting, the next day, I drove to Ressurection trail head to hike to the falls. Literally 3 cars were behind me and the on coming traffic was 4 cars. This is only a huge problem in the summer months. We live in Alaska, a wild place. Why are you trying to tame it for a new bridge, over a creek, prime wildlife habitat, hiking and beauty. All for a "safer road" which will not be used in winter because of the grade. It won't be used in summer because people traveling to AK want to see the river. Yes the speed limit is 55 mph on new road, with wider lanes and wider shoulders but 55 mph speed limit will cause accidents.

My solution:
1) Lower speed limit to 30 and enforce it.
2) No parking on shoulder.
3) Enforce the 5 car limit behind motor homes.
4) Accept that going to Anchorage is difficult i summer months.

RESPONSE: DOT&PF and FHWA re-examined the stated purpose of the project, took an additional look at the suggestions like these in the Final EIS, and have reaffirmed that attempts to find an alternative that stays 100 percent on the existing alignment would not satisfy the project purpose and need and/or would not be feasible based on sound engineering practice.

We live in a beautiful place, let's keep it that way. Stop trying to make it like the lower 48.

ID: 1514 **Source:** Email **Date Submitted:** 4/16/2018
Name: Sammy Crawford
Organization:

The proposed bypass is in critical habitat for wildlife and wetlands. The amount of gravel and the length of the bridge in the proposed area is unsatisfactory for protection of the resource. This area has been protected for many years and should continue to be protected.

Sammy Crawford
50 year resident on the Kenai Peninsula
scrawfordak68@gmail.com

RESPONSE: DOT&PF and FHWA have disclosed the habitat and wildlife impacts, and have coordinated mitigation with the agencies managing those resources. The location and length of the bridge and amount of fill needed to construct the project have been evaluated by professional engineers to determine the impacts. All measures to minimize harm have been identified and are committed to in the Final EIS and ROD.

ID: 1515 **Source:** Web **Date Submitted:** 4/16/2018
Name: Robert L. Baldwin
Organization:

See attached comment file submitted by the Friends of Cooper Landing (FOCL).

Attached text follows:

Friends of Cooper Landing, Inc.
P.O. Box 815
Cooper Landing, Alaska 99572-0815
907-250-3913
kenailake@arctic.net

April 16, 2018

Sterling Highway MP 45-60 Project
DOT&PF Central Region
P.O. Box 196900
(emailed: www.sterlinghighway.net
Anchorage, AK 88519-6900

Dear MP 45-60 Project Team:

The Friends of Cooper Landing (FOCL) are pleased to submit comments about the Final Environmental Impact Statement for the Sterling Highway 45-60 Bypass Project (Bypass). FOCL functions to represent the best interests of Cooper Landing.

All Bypass alternatives cause impacts in Cooper Landing. These comments are intended to mitigate impacts that will result from the mandated Juneau Creek Alternative. Concerns about impacts are addressed in following topic areas

1. Trail Continuity. Cooper Landing is a community of walkers and hikers. It is very important to maintain continuity of existing trails and walkable pathways along roads. Access to safe trails and pathways is a routine part of the Cooper Landing lifestyle.

Trail heads, parking areas, and safe pedestrian crossings must be continued or provided by the Bypass

project. Trails and pathways of primary importance are:

1A. Resurrection-Juneau Creek Trail
1B. Slaughter Gap Trail
1C Old Sterling Hwy, “Our Point of View road” pathway uphill from MP 45.0 to 45.5

RESPONSE: DOT&PF and FHWA worked with adjacent land managers and have agreed to provide trailhead parking where those managers need/desire it to support their land management objectives. The land managers requested these trailheads and have agreed to maintain them. Trail grade separations are proposed for the Resurrection Pass Trail, Bean Creek Trail, and Slaughter Gulch Trail. During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the “safety trail”) that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the “safety path” that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

2. Wildlife Corridor Continuity. A wildlife habitat corridor exists from Cooper Creek across the valley to Juneau Creek, and is used bears and ungulates. The Bypass project must provide safe wildlife crossings.

RESPONSE: The Final EIS fully documents and discloses the potential wildlife habitat impacts and proposes mitigation. The proposed mitigation is based on extensive wildlife crossing research, which included modeling to identify likely wildlife use corridors that have been validated with a year’s worth of field camera tracking data to identify the locations most conducive to providing effective crossings.

3. Quartz Creek Road Intersection. The MP 45.0 intersection must be safely designed in all respects, including safe pedestrian crossings, turning vehicles, and reduced vehicle speed. Quartz Creek Road access westbound requires a left-turn lane and access downhill east-bound a right-turn lane.

RESPONSE: The intersections will be engineered to be safe and meet the traveling needs commensurate with a NHS facility. The intersections are planned to have turn lanes and would be lit to facilitate the safe exchange of traffic between the old and new highways.

It appears necessary to somewhat reconstruct Quartz Creek Road approaching the intersection. The Quartz Creek Homeowners Association is concerned that residential properties on Quartz Creek Road must not be negatively impacted. Also, adequate intersection lighting is necessary, but the Quartz Creek Homeowners’ Association does not want residences to be directly illuminated.

REPSONSE: Engineers will work with affected property owners during the design process to refine the design, understand property owners’ issues, and try to make the design work for adjacent properties as best as possible. During subsequent phases, DOT&PF right-of-way agents will be available to discuss right-of-way needs and remedies. Should right-of-way be needed or access reconfigured, the right-of-way agents will be in touch with property owners. Property acquisition will be in accordance with the Uniform

Relocation Act. The Final EIS includes commitments to the use of light fixtures that would be shielded and directional to direct light principally downward.

Sincerely,

/s/ Robert L. Baldwin, President

ID: 1516 **Source:** Comment Form **Date Submitted:** 4/2/2018
Name: Jim Graige
Organization:

For me this is the best selection for the bypass route. It has the best route to stay away from the river. There are no need of any new bridges to cross the Kenai River. This route effects the least amount of private property or businesses. Will aleviate a lot of traffic congestion along the river and the town of Cooper Landing. No shoulders anywhere along the hiway in the Cooper Landing area - a real safety hazzard during fishing season and winter conditions. There should be ample parking for the Fuller Lakes Trail.

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1517 **Source:** Comment Form **Date Submitted:** 4/2/2018
Name: Ken Green and Kay Thomas
Organization:

We are in favour of the chosen Juneau Creek Alternative. It appears to be the best choice.

Thank you
K&K

RESPONSE: Comment noted.

ID: 1518 **Source:** Web **Date Submitted:** 4/16/2018
Name: Bert Young
Organization:

Now I see a report that Cooper Landing residents want to extend the 35 mph speed limit to the Sterling Highway MP 50.8 to 52.8. The Juneau Creek variant looks good to me. All the more reason to get this bypass built.

RESPONSE: Comment noted.

ID: 1519 **Source:** Email **Date Submitted:** 4/14/2018
Name: Jim Harpring
Organization:

From: James Harpring [mailto:jvharpring68@gmail.com]
Sent: Saturday, April 14, 2018 5:50 PM
To: Deren, Nicole [Nicole.Deren@hdrinc.com]
Subject: Re: Sterling 45-60 Comment Form

Well so much for comments transmitted via snail mail.

First concern was about the discrepancy on the width of the proposed addition as 12 x 2 and two breakdown lanes of 10 feet each respectively. However; in section three the bridge over Juneau Creek clearly states it is wider. When you attempt to research the reason (s) for this width different there is no exploitation.

RESPONSE: See the *Preliminary Bridge Structures Technical Report*, available on the project web site (http://sterlinghighway.net), for additional information on the bridges. Final bridge widths may be modified during final design based on refined geotechnical and other information.

Then your told that there are appendices that are only available to the public when you ask for them....come on now, how are you supposed to ask for something that you are not aware are available.

Need to acknowledge, two things. A disclaimer that not all enclosures, appendages and attachments are not identified in the public documents.

RESPONSE: EIS appendices contain all enclosures; however, there are other supporting materials developed over the course of the project that are not appended. These reports are available on the project web site (http://sterlinghighway.net), under the heading “Other Documents.”

And secondly, a reason for the width differences on the Juneau Creek bridge.

RESPONSE: In general, the project proposes two 12-foot lanes and two 8-foot shoulders (shoulders are not 10 feet as indicated by the commenter). In locations where there are passing lanes or pedestrian paths, the width can be wider. Chapter 2 indicates that the proposed new bridge would be 62 feet wide with two 12-foot traffic lanes, one 12-foot westbound passing lane, 8-foot shoulders, and a 6-foot pathway on the south side of the bridge (the same width is identified in the *Preliminary Bridge Structures Technical Report*). Figure 2.6-9 in the Final EIS depicts a proposed cross section of the Juneau Creek Bridge.

I did not want to openly address this in the public meeting because of the person in attendance who apparently had concerns about the bridge. Maybe she should have read the EIS before she challenged the presenter.

Jim Harpring 907 953 0784, call me if this email makes less than common sense

ID: 1520 **Source:** Web **Date Submitted:** 4/16/2018
Name: Margie MacNeille
Organization:

I urge that you adopt the No Build alternative, and pursue less dramatic solutions to the problem areas in the road segment.

My husband and I have a cabin in Quartz Creek, which we use year-round. We hike and ski the Bean Creek and Resurrection Trails frequently and so I am familiar with the area that the Juneau Creek alternatives will impact. To cut a swath for three or more lanes with 30 foot clearings on either side through this undeveloped landscape is a destructive travesty.

Taking Federal Highway funds to solve the issues in this segment is a mistake. New highway would have to meet federal standards, which are intended to promote speed and low density of vehicles instead of landscape, wildlife and local values. The proposed construction of the largest single-span bridge and the largest wildlife overpass put the proposed Juneau Creek alternatives into the mega- project category, without providing real solutions. The interests of long-haul trucking and people rushing to Homer should not trump the local interests, the concerns for wildlife habitat, and the national decision to set this land aside for non-highway uses.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

Choosing a build alternative is justified in the EIS by the safety aspects of current road congestion. However, examination of the accident and crash reports (Appendix A and Section 3.6) suggests that traffic congestion is not a significant factor in crashes. First, winter crashes are almost 4 times as high as summer rates (Table 1, Appendix 1), and summer rates are below state averages. This would suggest that those pesky RVs and summer visitors are not major contributors to crashes. Congestion is cited in only 15% of crashes (Appendix 1, Section 3.2.2). Furthermore, the five fatalities in the period studied were caused by driver error: 3 by alcohol, one by sleep and one by speed in snow. No alternative will have a significant effect on drunk driving or the urge to speed, as fatalities on the upgraded Seward Highway continue to show us.

REPSONSE: The purpose and need is multi-faceted. DOT&PF and FHWA are trying to solve congestion and design issues, which contribute to safety problems. Multiple driveways and lack of shoulders and clear zones contribute to safety problems, and cause drivers to slow down. People pass in unsafe locations because of the congestion. Creating a NHS that efficiently and safely moves people and goods is the responsibility of DOT&PF and FHWA. The information in Appendix A (*Crash Analysis*) and Section 3.6 of the Final SEIS clearly identifies a need for improving safety in this stretch of highway.

The EIS selects the Juneau Creek alternative using a 'least harm' alternative. Before inflicting the substantial harm all of the build alternatives require, harm that is necessitated by compliance with federal standards, mitigation of the individual trouble spots must be considered. There is a limit to the solutions

which can be built, but the major mitigating measure is obvious: slow the traffic down. Higher speeds do not justify sacrifices of hundreds of acres and hundreds of millions of dollars, even federal dollars. Please choose the No Build, Go Slow alternative.

RESPONSE: DOT&PF and FHWA examined an alternative that would use the existing alignment throughout. The results are reported in Chapter 2 (Section 2.5.1) of the EIS. In short, issues remain in this area that result in this alternative not meeting the project purpose and need or in engineering feasibility problems. The physical issues of roadway geometry and unstable bluffs coupled with the traffic engineering issues mean this alternative is not reasonable. See also the response to Comment Group 56 in Appendix J (*Comments and Responses on the Draft SEIS*) of the Final EIS.

ID: 1522 **Source:** Email **Date Submitted:** 4/16/2018
Name: Alex Kime **Title:** Owner
Organization: Alaska Horsemen Trail Adventures

State of Alaska DOT
Sterling Highway
Cooper Landing By-Pass

Dear DOT,

I am writing to request an “UNDER PASS” for horses and pedestrians near the intersection of Quartz Creek Road and the Sterling Highway. Attached is a photo of an under-pass that may work.

I am Alex Kime and I own Alaska Horsemen Trail Adventures on Quartz Creek Road in Cooper Landing. We guide trail rides on trails where we cross the Sterling Highway on a regular basis.

Crossing the highway with horses on the new proposed highway is a big safety concern. I would assume the speed limit will be at least 55 if not 65 mph.

I would ask for an under pass to cross the highway. This would provide a safe passage for hikers as well as bike riders and horses.

We are permitted to use established trail systems which are on the north side of the highway. It is necessary to cross the highway on a regular basis to assess them. We have been doing this crossing for nearly 20 years. There is a horse crossing sign on the highway at this time and also a 45 mph speed limit.

Attached photograph follows:

RESPONSE: An underpass in the MP 44–45 area, near Quartz Creek Road, was considered by engineers in preparation for the Final EIS. The topography in the MP 44–45 area is not conducive to providing a horse underpass. The existing marked horse crossing would remain under all alternatives, just east of the project terminus. The horse crossing location, according to the signage on the highway, is intended to occur in the straight-away within an area currently signed for 55 mph. It is acknowledged that the horse crossing occurs just beyond the speed limit change from 45 to 55 mph. The text of the EIS in Sections 3.8.1 and 3.8.2 under the "Trails" subheading has been revised to acknowledge the horse crossing and indicate that slightly higher average speeds in this area may make crossing by horses more difficult and less safe.

During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the "safety trail") that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the "safety path" that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

Please call me if you have any questions or you need more input regarding what would work for an underpass.

Sincerely,
Alex Kime
Alaska Horsemen Ranch
Cooper Landing, Alaska
Cell phone, 907-598-1806

ID: 1523 **Source:** Email **Date Submitted:** 4/16/2018
Name: Theo Lexmond
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Theo Lexmond
P.O. Box 873
Cooper Landing, AK 99572

April 16, 2018

Brian Elliott,
Environmental Manager
DOT&PF Central Region
Sterling Highway MP 45-60 Project
P.O. Box 196900
Anchorage, AK 99519-6900

Dear Mr. Elliott:

I am writing to express my thoughts regarding the Sterling Highway MP 45-60 Project Final Environmental Impact Statement (EIS). I commented extensively on the original release of the EIS last year. I will not reiterate the objections and concerns that I voiced with the project at that time. I will simply say that I continue to believe they remain valid.

In my opinion the Cooper Landing Advisory Planning Commission has done a good job of addressing issues with the project as it stands today. I am in support of their expressed concerns as listed below:

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the Kenai River that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not allow overnight camping but should allow for overnight parking, as many users will park here for overnight hiking trips.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing

Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project. Improving the "walkability" within the existing Sterling Highway corridor will not only enhance safety and access for pedestrians and bicyclists but will also enhance the economy of the community by attracting visitors who can safely and effectively visit both businesses and the local recreation attractions. This should be the minimum level of mitigation for the extensive recreational and economic impacts upon the Cooper Landing community by this project. Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems. Please see the following web pages for greater information about the Cooper Landing Safety Path: http://www.walkcooperlanding.org/safety-path/ and http://www.walkcooperlanding.org/historical-timeline/.

- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and recreational facilities accessed there. We feel that failing to provide this crossing would be negligent.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.
- It cannot be overstated that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
        - Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.
    - Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass

trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

- Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Thank you for the opportunity to comment on the ongoing implementation of this project. My feeling, as a resident of Cooper Landing, is that the impact of this project on my community will be permanently detrimental. I feel that the community of Cooper Landing, its scenic beauty and its wildlife are being sacrificed for the desire of all the rest of South Central Alaska to get where they want to go a few minutes faster. The Kenai River is only minimally better protected by implementation of this project, putting a lie to all those who are using this excuse as the reason to move forward with this much devastation to our beautiful valley. It is a real shame.

Sincerely,

Theo Lexmond, Cooper Landing
907-595-4686, tlexmond@gmail.com

ID: 1524 **Source:** Web **Date Submitted:** 4/16/2018
Name: Michael O'Meara
Organization:

Michael S. O'Meara April 16, 2018 Comments on the Sterling Highway Milepost 45-60 Project Final Environmental Impact Statement

Since it's release I've spent time reviewing sections of the FEIS relating to areas of concern presented in my May 26, 2015 Comments on the Draft Supplemental EIS. Unfortunately, in spite of the volume of the assembled documents, the Sterling Highway Milepost 45-60 Project looks even worse now. By selecting the Juneau Creek alternative you have embraced the plan that will lead to the maximum possible harm. Not that the others offed good choices. I continue to feel that Alaska design standards for "road rehabilitation projects within existing alignments" could have met the needs for this project with fewer negative impacts and at far less cost.

RESPONSE: DOT&PF and FHWA re-examined alternatives that attempted to stay on the existing alignment in response to comments on the Draft SEIS. The results are reported in Chapter 2 (Section 2.5.1) of the Final EIS. In short, issues remain in this area that result in the alternative not meeting the project purpose and need or in engineering feasibility problems. The physical issues of roadway geometry and unstable bluffs coupled with the traffic engineering issues make this alternative not reasonable. See also the FEIS response to Comment Group 56 in Appendix J (*Comments and Responses on the Draft SEIS*) for more information.

The Juneau Creek Alternative
As the FEIS clearly points out, the Juneau Alternative promises the greatest, cumulative, negative impacts. Unfortunately few meaningful mitigation measures are offered. My overriding concern is that the FEIS seems to conclude that the many serious negative impacts of the project are unavoidable. Before moving forward I would like see greater effort put into finding ways to reduce the harm.

RESPONSE: The Juneau Creek Alternative does not have the greatest cumulative, negative impacts. DOT&PF and FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm. This decision was made after full consideration of mitigation commitments and consideration of all measures to minimize harm. These commitments are disclosed in the Final EIS and reiterated in the ROD.

Resurrection Pass Nation Recreation Trail
By truncating the southern end of the Resurrection Pass Nation Recreation Trail the new highway and bridge over Juneau Creek will badly degrade the Juneau Falls Recreation Area and introduce unacceptable noise levels along Resurrection Pass and Bean Creek Trails. The FEIS makes little of this and fails to address the probability that by building this highway at elevation and designing it for high speed traffic, noise will significantly increase along the river corridor below. New infrastructure to provide access around the highway and at or near Juneau Falls will degrade the experience of trail users and people visiting the falls.

RESPONSE: The Final EIS fully discloses the impacts described by the comment, including the effects of bridging over the trail, changes to the Juneau Falls Recreation Area, and noise at these facilities. In fact, based on comments received on the Draft SEIS, DOT&PF and FHWA did add receptors to the noise model and disclosed noise impacts associated with the Resurrection Pass Trail crossing.

See Section 4.5.4.2 for a discussion of impacts associated with the Resurrection Pass Trail, and Section 4.5.4.5 for impacts associated with the Juneau Falls Recreation Area.

Kenai River Still at Risk
By building a new section of highway up slope of the of the Kenai River and having to bridge a number of its major and minor tributaries doesn't protect the river. An increased speed limit almost assures the collisions will be more likely and more severe. Spilled fuel or other pollutants flow down hill.

RESPONSE: The purpose of the project is not to eliminate the risk of spills in the Kenai River, but to reduce congestion, bring the highway up to current standards, and improve safety. Compared to the other build alternatives, the Juneau Creek Alternative performs the best on measurable purpose and need criteria. The data bear out that the Juneau Creek Alternative alignment will substantially reduce the risk of crashes, including truck crashes; has considerably less of its alignment in proximity to the Kenai River and other Tier 1 streams (reducing the potential that should a spill occur it would reach the steam or river system); and allows more time to respond, compared to other alternatives, should a spill reach a stream.

The Final EIS included a new crash analysis report (Appendix A) that documents predicted crashes in 2043 based on the Highway Safety Manual Predictive Method procedures. Compared to the No Build Alternative, the Juneau Creek Alternative has substantive safety benefits for both NHS traffic and the traffic on the old highway. The analysis predicts a 69.7 percent reduction in crashes on intersections and segments on the Juneau Creek Alternative as compared to the No Build Alternative. When considering

crashes on both the old and new highways as a system, building the Juneau Creek Alternative results in a 48.9 percent decrease in crashes on the system overall as compared to doing nothing.

Moreover, the analysis suggests the crashes will not be as severe. The crash analysis indicates that 10.9 fatal and injury crashes per year would occur in 2043 under the No Build Alternative, while 3.3 are predicted under the Juneau Creek Alternative.

Wildlife and Habitat

The FEIS acknowledges significant disruption of wildlife and loss of habitat. There will be extensive destruction of wetlands. The road will serve as a barrier to bear, moose, and other wildlife. That is expected to significantly increase animal/vehicle collisions. Mitigation in the form of some kind of wildlife crossings is discussed but plans are nebulous. With adequate design and placement they could moderate but not prevent this increase in animal kills. More negative bear/human interaction is expected to occur as highway noise and traffic drive animals into more populated areas. How will that be prevented?

RESPONSE: The EIS addresses impacts to wildlife in Sections 3.15 (Noise), 3.21 (Fish and Essential Fish Habitat), 3.22 (Wildlife), and 3.27 (Cumulative Impacts). These sections have been updated in the Final EIS to address public and agency questions and comments on the evaluation and completeness of the impact analysis. The Final EIS includes a specific mitigation plan for wildlife in Section 3.22 and Appendix I (*Wildlife Crossings Analysis and Recommendations*). The proposed mitigation plan has identified the placement and structure design of crossings based on preliminary landscape-scale wildlife movement corridors identified by a wildlife study, designed by wildlife biologists that used a habitat model and was validated by a separate field camera study of wildlife movement. The Final EIS refines other details such as the cost of the proposed mitigation. DOT&PF and FHWA are still committed to using data from the wildlife study (e.g., field validation) to inform the final design.

View Degradation and Noise Pollution

The project area occupies a beautiful travel corridor, one that enjoys a relatively low level of noise considering the amount of development along the present roadbed. While the Juneau Creek Alternative will result in impairment of the viewshed and significant increase in noise levels, no practical mitigation measures for either are offered.

RESPONSE: A noise study was prepared for this project and has been updated for the Final EIS. It included sound measurements in the project area and modeling of sound levels for dozens of homes, community facilities, campgrounds and other recreation sites, and dispersed and Wilderness recreation areas. Noise is addressed in Section 3.15 of the EIS. Although relatively few locations were determined to have Traffic Noise Impact substantial enough to consider noise mitigation, some were, and it was not possible to find a suitable mitigation method given the configuration of driveways that would create openings in noise barriers. This circumstance and other community impacts were important considerations in the least overall harm analysis at the end of Chapter 4.

Mitigation for visual impacts is included in Sections 3.16.2.2 and 3.16.2.5 of the Final EIS.

Urban Sprawl and Land Speculation

DOT&PF make assurances that to avoid spreading urban development along the new highway corridor that “Access to developable land adjacent to the bypass segments would need to be from the existing Sterling Highway only...” DOT committed to preventing development along the Serling Highway Homer Bypass when it was built (about 1978). Today the whole route is heavily developed. This is consistent with roadside development throughout the nation. Historical record will show that in all but a small

percentage of very unusual cases roadside development is virtually unpreventable.

RESPONSE: As explained in Section 2.6.2 of the Final EIS, access to those segments of each alternative that would be built on a new alignment would be controlled and DOT&PF will not provide direct driveway access. For the Juneau Creek Alternative, DOT&PF has agreed to reserve access for a potential connection using ramps to the rural residential development on State Management Unit 395. A connection would also be reserved for the CIRI Tract A development near the connection of the old and proposed highway segments under the Juneau Creek Alternative. The new highway is intended to serve the mobility of through traffic. By not allowing additional new access roads and driveways, DOT&PF can keep that portion of the new highway functioning at a high level, improve safety, and reduce congestion. By not permitting driveway access, DOT&PF can also avoid inducing commercial development and sprawl. DOT&PF and FHWA have specifically designed the alternatives as controlled access so that the build alternatives would not induce new growth. In that way, the project alternatives would not encourage community growth and thereby recreate the original problems. The decision to reserve access rights where segments are built on a new alignment is an FHWA environmental commitment in the EIS and will be enforced by FHWA.

Kenai National Wildlife Refuge Impacts
While the promise of a land trade between the Kenai National Wildlife Refuge and Cook Inlet Region, Inc. may keep the Juneau Creek Alternative from crossing the refuge just north of MP 55. Unfortunately the area involved is far too small to eliminate or mitigate the negative impacts to surrounding refuge lands, wildlife, and human users.

RESPONSE: Despite now considering the land exchange to be reasonably foreseeable, DOT&PF and FHWA still disclose the full impacts to Wilderness (see Section 3.2 in the Final EIS). Furthermore, cumulative impacts on Wilderness are described in Section 3.27 of the Final EIS.

Outdated Information
I don't have time or inclination here to point out the many cases where it appears that outdated information is used in the FEIS to support it's conclusions. Let me just provide one example from Chapter 3.27.4.3 - 564. "These emissions, implemented in concert with national fuel economy standard, are a major factor in mitigating the impacts of the increase in VMT. The EPA projects that vehicle energy efficiency (and thus GHS emissions) on a per-mile basis will improve by 28 percent between 2012 and 2040 (Houk, personal communication 2015). This improvement in vehicle emissions rate is more than sufficient to offset the increase in VMT associated with the project." Under the Trump Administration the EPA is in the process of attempting to roll back all regulations governing fuel efficiency.

RESPONSE: The Final EIS used information available at the time of its publication to document and disclose impacts. Furthermore, as is described in the EIS, traffic levels are anticipated to be the same with or without the project. In other words, under any build alternative, the project is not anticipated to induce new traffic within the project area. Therefore, vehicle related increases in pollutants are anticipated to be similar with or without the project. Future traffic will not be at levels near what would be needed to approach or exceed any of the National Ambient Air Quality Standards.

Obvious I disagree that there is a need such costly and disruptive project to increase highway safety through Copper Landing. I realize, however, that it is likely that the Juneau Creek project will ultimately be built. Before that happens I urge that the issue of mitigation is revisited with an eye to better preventing harm to resources and the quality of experience for people living and recreating in the areas that will be affected.

RESPONSE: Comment noted.

ID: 1525 **Source:** Web **Date Submitted:** 4/16/2018
Name: Kristine Route
Organization:

Dear Sterling Highway MP 45-60 Project Planners,

I am writing to you about my concerns with the Cooper Landing Bypass Proposal. I feel there are several things overlooked in the proposed plan that create a negative impact to the Cooper Landing Community, the overall safety of citizens, and the wildlife living in the area. I think that there are other alternatives to improve the traffic flow along the Kenai Peninsula that do not cut through a mountain side to avoid one town. Since the time of the first Bypass proposal, technology has changed, and other alternatives may exist that would promote a better road system for all. What is really needed is an alternate road that gets to Anchorage.

RESPONSE: The purpose of the project is to reduce congestion, bring the highway up to modern standards, and improve safety, not to provide an alternate road to Anchorage. DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources.

My concerns with the current proposal are:

-Road Maintenance: Where is the funding going to come from to hire more Department of Transportation employees and purchase more equipment to cover the costs of maintaining the Bypass and the existing highway? Who is going to maintain both roads? How will snow removal and sanding occur? I think we are barely keeping up with what we have, let alone adding a new highway to the mix.

RESPONSE: DOT&PF and FHWA are aware of the increased maintenance burden and have disclosed this in Section 3.5 of the Final EIS. In signing the Final EIS, the DOT&PF Commissioner is aware of the maintenance burden imposed by a realigned facility and is committed to the corresponding maintenance responsibility.

-Emergency Services: Who is going to provide the personnel for emergencies that occur on the Bypass? Currently, the Cooper Landing provides VOLUNTEER emergency services for accidents occurring on the Sterling highway. As it is we are constantly struggling to find individuals who can provide the time, have the appropriate credentials, and can handle the emotional commitment to fulfill this role. Also, if an emergency occurs on the proposed highway there are only two access points to get on the highway. I am concerned that the burden will fall to volunteers because there are no other resources to provide emergency support along the existing and proposed Bypass.

RESPONSE: The Juneau Creek Alternative will be safer and thus the burden to provide emergency response is anticipated to be reduced. The Final EIS included a new crash analysis report (Appendix A) that documents predicted crashes in 2043 based on the Highway Safety Manual Predictive Method procedures. Compared to the No Build Alternative, the Juneau Creek Alternative has substantive safety

benefits for both NHS traffic and the traffic on the old highway. The analysis predicts a 69.7 percent reduction in crashes on intersections and segments on the Juneau Creek Alternative as compared to the No Build Alternative. When considering crashes on both the old and new highways as a system, building the Juneau Creek Alternative results in a 48.9 percent decrease in crashes on the system overall as compared to doing nothing. Moreover, the analysis suggests the crashes will not be as severe. The crash analysis indicates that 10.9 fatal and injury crashes per year would occur in 2043 under the No Build Alternative, while 3.3 are predicted under the Juneau Creek Alternative.

-State Patrol: How are the highways going to be patrolled and who is going to enforce rules for the new highway? How are we going to ensure the safety of the new highway when we are unable to provide state patrol along the existing highways? I feel that if we currently had adequate law enforcement then the existing road through Cooper Landing would be patrolled and the speed limit would actually be enforced. As it is, people passing through have no reason to slow down, as no one is going to catch them speeding anyway; thus, contributing the accident rates and congestion. I am also concerned that the new highway will facilitate increased crime in and around Cooper Landing. Unless there is increased law enforcement, the existing roadway will continue to experience the safety issues and dangers that exist today.

RESPONSE: The new highway will be patrolled by Alaska State Troopers just as it is today. As mentioned above, both the old and new highways will be safer, and thus there would be a reduced need for troopers to respond to crashes. Again, the safety analysis completed for the project suggests that the safety issues with the current highway will be reduced substantially. There is no indication that crime would increase in Cooper Landing.

-Trail Access: Who will maintain the new trail access pull offs? How will the prevention of dumping, freedom camping, and human waste disposal occur? What will be done to protect the wildlife impacted by the new construction? I think the Bypass is going to create negative wildlife-human interactions because wildlife will have more difficulty getting access to the Kenai River. I am also concerned that the highway will take away from the quiet hiking experiences people seek when coming to this area.

RESPONSE: DOT&PF and FHWA coordinated the location of new trailhead with adjacent land managers. Those land managers have agreed to maintain those trailheads. DOT&PF and FHWA have agreed to design the trailheads with the amenities (trash cans, restrooms, etc.) if they were requested by the adjacent land managers. Trailheads and trail under-passes have been designed and located to minimize the potential for human-wildlife interactions. Separate wildlife crossings will be placed in locations most anticipated to be used by wildlife. Fencing and other design techniques will be used to encourage wildlife use of these dedicated crossings. The impacts to noise, and wildlife you mention are fully described in the Final EIS.

Bottom line is that I do not think that the Bypass is an effective use of resources and I think better alternatives that are more up-to-date with the times should be considered. I support the no-build alternative. Thank you for your time and consideration.

Sincerely, Kristine

ID: 1526 **Source:** Web **Date Submitted:** 4/16/2018
Name: Jessica Larsen
Organization: Cooper Landing Vacation Rentals

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

As a year-round resident of Cooper Landing since 2011 and a thriving small business owner (Cooper Landing Vacation Rentals), I have a few things I would like to see addressed in the final designs and plans for the Sterling Highway Bypass Project (MP 45-60).

The most important of these are directly related to mitigating the negative impacts this project will have on Cooper Landing in many aspects - economically, environmentally, logistically, etc. There has been insufficient effort put into planning mitigation measures for our community. This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Some of my concerns and ideas are:

- The Cooper Landing Walkable Community Project has spent years formulating concrete needs and plans to improve the non-automobile transportation logistics in our community. Mitigation planning should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
- Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.
- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. Failing to provide this crossing would be negligence.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic - on weekends in July, traffic at this junction is known to back up AT LEAST 8 MILES! Both ends of the new project need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be in addition to general local traffic hardships and emergency vehicle access problems.

- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit. For instance, providing pedestrian walkways on the Snow River bridges on the Seward Highway is NOT (!!!) an acceptable mitigation measure for the crossing of Resurrection Pass Trail. (Mitigation applied to the Snow River bridges creates a connection to a DIFFERENT long-distance trail in the National Trails System in a DIFFERENT community than the one affected by the project and does NOT adequately address the affected trail or community.) Consider instead construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead, where only a narrow shoulder on the road serves as pedestrian access, and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access. These are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit. Also, constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway. We must make the existing highway a draw for tourism and sight-seeing.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landing's services and economic opportunities, including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- It CANNOT BE OVERSTATED that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail - in perpetuity.

Also, please fully take into consideration the following:

- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming de facto camping sites or shooting ranges.
- The Juneau Creek parking area by the proposed Bypass must not include overnight camping but should allow for overnight parking.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.

Thank you for your attention to these comments and considerations.

Jessica Larsen
Cooper Landing Vacation Rentals

ID: 1527 **Source:** Email **Date Submitted:** 4/16/2018
Name: Patrick Lavin
Organization: Defenders of Wildlife

Hello,

Attached are comments on the FEIS for the Cooper Landing Bypass project. Please contact me with any questions you may have.

Thanks - [cid:image001.gif@01D32BE9.DD538910]

Patrick Lavin

Senior Alaska Representative

Defenders of Wildlife

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Anchorage, Alaska
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RESPONSE: The attachment is found at ID 1546.

ID: 1528 **Source:** Web **Date Submitted:** 4/16/2018
Name: Sean Norris
Organization:

Dear Sterling Highway MP 45-60 Project Planners,

My name is Sean Norris and I am a lifelong Cooper Landing Resident. I am concerned about the proposed Bypass for the Sterling Highway as I would prefer to see the existing highway properly maintained and supported. I feel that over the years the existing highway has been degrading and efforts to keep it in top notch shape have fallen. I think that efforts should be put towards making the existing road more user friendly. The funding that will be put toward carving out the mountain side could be used to update the curved sections between mile post 45 to 60 to provide safer travel along these corners as well as providing bank side support. I also think that providing increased law enforcement would improve the safety of the highway through this section. Currently, Cooper Landing has no State Patrol enforcing the 35 miles per hour speed limit. If this was enforced drivers wouldn't go so fast around the curves. I also think that building a larger parking lot at Sportsman's Boat Launch and scenic overlooks throughout this corridor would reduce the amount of traffic parking and stopping along the roadside causing congestion. Furthermore, if safe walking paths were provided through the community tourists and locals could walk alongside the road taking in the view and getting around town; potentially, reducing the amount of traffic travelling short distances throughout the community. If stoplights were installed by Sportsman's Boat Launch and by Sunrise Inn, the traffic would be better controlled. People would be accelerating from zero to 35 mph which is mentally much easier than reducing your speed from 55 mph to 35 mph. The monetary and environmental costs of these efforts would be considerably less expensive than the proposed Bypass.

RESPONSE: DOT&PF and FHWA examined an alternative that would use the existing alignment with the kinds of minor improvements you suggest. The results are reported in Chapter 2 (Section 2.5.1) of the Final EIS. In short, issues remain in this area that result in the alternative not meeting the project purpose and need or in engineering feasibility problems. The physical issues of roadway geometry and unstable

bluffs coupled with the traffic engineering issues mean this alternative was determined not reasonable. See also the response to Comment Group 56 in Appendix J (*Comments and Responses on the Draft SEIS*) of the Final EIS.

Thank you for your time and consideration in thinking about the community atmosphere of Cooper Landing. I am a supporter of the no-build alternative as I think other options exists that will preserve the beauty and integrity of the Kenai River headwaters while still providing for commuter safety.

Thank you,
Sean Norris

ID: 1529 **Source:** Email **Date Submitted:** 4/16/2018
Name: Todd and Michelle Donahue
Organization: Alaska Streamers

Please see attached document thank you
Michelle Donahue
907-244-4644

RESPONSE: This letter is a duplicate of ID 1494. See responses under ID 1494.

Attached text follows:

Todd & Michelle Donahue
19906 Sterling Hwy/Mile 47
Cooper Landing, AK 99572

We bought our first piece of property in Cooper Landing on the north side of milepost 47 on the Sterling Highway because we loved the tranquility, the wildlife, and the pace of a small town atmosphere. 3 years later we bought our home and moved here full time.

Here we are in 2018, 3 years from paying off our home and retirement in sight, and we're being told we will have a highway wrapping around 3 sides of our property in a short time. In fact, on the latest preferred Juneau Creek Alternative EIS map, it appears that it will be wrapping around our house on 3 sides100-300 feet from our property line and merging at our driveway at one point!

We have many concerns!

SAFETY-
From May through October we run a fishing business. We are pulling boats in and out of our driveway.

With the on/off ramp merging at our driveway and summer being the busiest time of year in Cooper Landing, we are concerned with the safety of using our own driveway in amongst the motorhomes, semi trucks and trailers (that choose not to bypass).

VISUAL-
We have a coveted piece of land that is south facing, good gravel/drainage and an amazing view of Ceicil

Rhodes Mountain in our front yard and Langle (I think it's spelled something like Langelle) in back with privacy. We have seen moose, brown and black bears, coyotes, lynx, eagles and snow shoe rabbits in our yard. We love the wildlife that lives in our back yard. We have even had a sheep visit! Now we're going to be surrounded on 3 sides with traffic and potential headlights coming in our windows.

We have campfires in our backyard with clients all summer/fall and frequently throughout the winter/spring months. The tranquility and serenity that brought us here are now being threatened. We were told at the most recent meetings you had here in Cooper Landing and Anchorage that you feel no barriers of any kind are needed along the preferred alternative route because your research found that barriers would be ineffective.

SOUND-
We do live on the Sterling Highway and do have traffic noise out front mainly in the month of July during dipnet season. Now we will be surrounded on 3 sides of traffic. We've been told only 30% of the traffic will now becoming through Cooper Landing but it is still literally wrapping around our home. A three- lane highway in our backyard with a 5-6% grade not only lends itself to jake braking but also to acceleration pipes humming while climbing (this came from a trucker that we spoke to regarding the5-6% grade).

Our concerns are real. We live here 24/7 and are looking at the "BIG" picture. We currently live in rural Alaska which was our dream coming true moving here and to this location. We were planning on retiring here and loving our life. However, your proposed highway at mile 47 (which is wrong on your map by the way) is right at our driveway.

We, Todd and Michelle Donahue, are highly impacted by the preferred Juneau Creek Alternative route. We are impacted more than any other Cooper Landing resident.

We invite your surveyors/planners/designers to our property to hike around our back yard with us to discuss and evaluate your proposal.

We need more detail about your on/off ramp at mile 47. As it appears you will have left turn issues at peak times. We would also like information about how you will discourage large vehicles from entering the town and keeping them on the bypass at all times for safety issues and to fulfill the proposed purpose of the bypass.

PLEASE realize that the impact of this project is huge for us. It is a real concern for our future. We look forward to sitting down and discussing in more detail what options may be available to us. We're not looking for a buyout. We can't afford to purchase anything here in Cooper Landing at today's market prices. Another mortgage isn't ideal for us either. However, if we do get to a point where the preferred Juneau Creek Alternative with no barriers of any kind will be constructed, we would consider discussing a land swap so we can stay in Cooper Landing. So as we get closer and hard decisions are made, please contact us.

Lastly, we are requesting a written response before the record of decision on ALL of our concerns outlined in this letter.

Thank you for your time and please take us up on our invitation to come to our property and talk with us.

Todd & Michelle Donahue
19906 Sterling HWY/mile 47

Cooper Landing, AK
Todd & Michelle Donahue
907-244-4644

ID: 1530 **Source:** Web **Date Submitted:** 4/16/2018
Name: Karen Button
Organization:

I do not support the Juneau Creek Alternative, nor do I support any of the other proposed Alternatives.

The basis and foundation for this EIS is faulty as it erroneously used a 60mph zone as its guide, yet did not justify that speed for its evaluation. Nor did it adequately address why highway improvements could not be made to the existing roadbed utilizing the currently posted miles-per-hour, similar to both Moose Pass and Sterling.

RESPONSE: DOT&PF and FHWA selected a design speed of 60 mph based on highway design standards. See the response to Group 29 in Appendix J (*Comments and Responses on the Draft SEIS*) of the Final EIS.

DOT&PF and FHWA reaffirmed that attempts to find an alternative that uses the existing alignment throughout would not satisfy the project purpose and need and/or would be not feasible based on sound engineering practice. The results are reported in Chapter 2 (Section 2.5.1) of the Final EIS. In short, issues remain in this area that result in the alternative not meeting the project purpose and need or in engineering feasibility problems. The physical issues of roadway geometry and unstable bluffs coupled with the traffic engineering issues mean this alternative was determined not reasonable. See also the response to Comment Group 56 in Appendix J (*Comments and Responses on the Draft SEIS*) of the Final EIS.

The JCA will be extremely costly, irrevocably damage trails and wilderness areas within the Resurrection Trails system, irrevocably damage wildlife passage through the already narrow corridor through Cooper Landing (which could have very negative impacts especially to threatened brown bear populations, which are an "island" species on the Peninsula according to definitions used for the landmark Yellowstone brown bear program), and have a negative impact on Cooper Landing businesses.

Regarding brown bears, any further reduction of travel corridor and contiguous wilderness should be absolutely avoided in order to avoid upgrading of the Kenai Peninsula brown bear under the Endangered Species Act.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

As carefully documented in my comments to the Supplemental to the Draft EIS, DOT&PF and FHWA would avoid the problems associated with the above and save American taxpayers millions of dollars by choosing the No Action Alternative and, instead, creating a new Alternative in which the existing roadbed

is utilized in a creative milepost-by-milepost plan. The new Alternative should use a combination of passing lanes, slow vehicle turnouts, and middle turn lanes along with site by site opportunities to straighten the highway and to remove it from Kenai River where possible. Please see comments to the Draft Supplemental EIS from Karen Button.

RESPONSE: DOT&PF and FHWA considered and responded to your comments on the Draft SEIS. See Appendix J (*Comments and Responses on the Draft SEIS*). In short, as mentioned above, the alternative you identified was given a hard look and re-examined between the Draft and Final EIS. It does not solve the problems identified in the purpose and need chapter, and it is not technically feasible. See also the response to Comment Group 56 in Appendix J (*Comments and Responses on the Draft SEIS*) of the Final EIS.

Additional rights-of-way should be purchased wherever possible to accommodate the above and to incorporate into the design the already-used bike/quad/pedestrian pathway alongside the Sterling Highway through Cooper Landing. A multi-modal transportation model ought to have been used for the design and selection of Alternatives in the Cooper Landing Bypass proposals.

Thank you for this opportunity to provide comment.
~Karen Button

ID: 1531 **Source:** Web **Date Submitted:** 4/16/2018
Name: Miles Knotek
Organization:

Moving the highway to Juneau Creek is not ideal for the Cooper Landing community due to resource damage to the area, impact on the watershed and economic loss to the community due to the bypass. As a lifelong resident of the area, I can't imagine losing the Juneau Creek area to highway and dip netting season traffic.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

ID: 1532 **Source:** Web **Date Submitted:** 4/17/2018
Name: Martha Siebe
Organization:

I am an Anchorage resident, but have enjoyed over 20 outings on the Resurrection Trail both winter and summer, accessed from both the official trailhead at Schooner Bend and the Bean Creek access. I feel that not enough consideration has been given to the impact on a National Historic Trail. Quiet, and a feeling of being away from modern civilization is part of the value of places like this. The Juneau Creek Alternative, and most other options, will bring noise and easy access to an area that has formerly been wild, free from traffic noise, and few vandalism issues. The whole character of the Juneau Creek Valley

will be altered.

RESPONSE: The impacts you describe are discussed in Chapter 4 of the Final EIS.

The Bean Creek Road is home to residents who chose this location in an effort to be away from traffic, and the river. Now they will be subjected to a constant background noise, and effects of nearby traffic. Trucks shifting up and down, as well as breaking will be an intermittent noise. Just because no effective noise barrier is practical, doesn't mean noise is not an impact. This was the impression given at the Anchorage open house.

RESPONSE: DOT&PF and FHWA have described noise impacts in the Final EIS and have disclosed locations where substantial noise impacts are anticipated. The discussion at the open house acknowledged there will be noise impacts and that mitigation was considered, but that effective noise mitigation is not practicable. See the noise impact analysis in Appendix D (*Highway Traffic Noise Assessment*) for further explanation.

In past comments I have brought up the 6% downhill grade that faces generally South, for about 2 miles.

In this area there will be snow throughout the winter, and the sun will have extra effect on this road even when plowed, as snow melt will run across it. At night, whatever moisture is on the road will refreeze, and create a hazard. I believe that the road into Seward experienced more and more severe accidents after it was upgraded because drivers did not adjust for the conditions. The wide, highway appearance, gave drivers the confidence to go too fast and lose control. I believe this same effect will take place on the South-facing stretch of the Juneau Creek Alternative, and that your projected accident rate will be higher than expected, and accidents will be more severe. Ice on the Juneau Creek Canyon Bridge will undoubtedly be another hazard.

RESPONSE: DOT&PF and FHWA are aware of the effect that the south facing aspect will have on the roadway and have discussed this effect in Section 3.12 of the Final EIS. The analysis suggests that the south facing slope will get more sun, which will help melt the snow earlier and keep the roadway drier.

I heard something about Snow River being a mitigation, but have been unable to find this in your document. Snow river is a long way from the area impacted.

RESPONSE: The proposed mitigation is specific to the Resurrection Pass Trail, and was proposed and coordinated with the Forest Service as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. Snow River Bridge mitigation is discussed in Section 4.6.4 of the Final EIS.

Again at the open house, I heard comments indicating that Cooper Landing residents think their situation will be improved by having the official state highway up on the hill. I don't believe they realize that the money for planning, making shoulders and bike trails, driveway safety or general road upgrades, will not be available when they are only an alternate route.

RESPONSE: The programming of projects, including this one, goes through a rigorous statewide evaluation and ranking process, which is ultimately approved by the DOT&PF Commissioner and FHWA. This project is anticipated to be funded using NHS funds, which are required to be used on the NHS. Those funds are not generally available for local roads, bike trails, or general road upgrades, except on the

NHS

ID: 1533 **Source:** Web **Date Submitted:** 4/17/2018
Name: Paul A. Shadura II
Organization: South K-Beach Independent Fishermen's Association (SOKI)

Please see attached file;

Attached text follows:

April 16, 2018

Comments: Sterling Highway MP 45-60 Project
DOT&PF Central Region
Preferred Route: Juneau Creek Alternative
Attn: Brian Elliot

The South K-Beach Independent Fishermen's Association (SOKI) represent commercial setnet salmon fishermen who harvest fish on the southern eastside beaches of central Cook Inlet (CI). The health of the Kenai River is of great concern to our fishing community. We are an historical fishery with over 100 years of harvesting activities along the shores of CI.

We support any plan that will minimize the negative environmental impacts to the Kenai watershed and we do applaud the commitment to preserve and to mitigate to ensure a healthy and robust environment for "Fish and Essential Fish Habitat".

RESPONSE: DOT&PF and FHWA selected the Juneau Creek Alternative, in part due to the reasons you mention. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

We highly support "Mitigation Measures" that will administer a fee to a relevant land conservation group and would highly recommend the "Kenai Watershed Forum" as a recipient of the compensatory fee.

They are well established and continue to monitor the health and actively mitigate negative impacts throughout the entire Kenai River watershed.

We have a recommendation for a direct mitigation project as the "Essential Fish Habitat" report describes several areas on both the new highway re-routes and the current roadway that have deficient fish passage culverts. Identified as; unnamed one, two and three although there are other "no-names" that might also be impacted. Interesting to note that all are classified as anadromous salmon waterbodies and also resident species of finfish have also been documented.
We agree with, "New culverts and replacement culverts would be designed to modern fish passage standards …, and, Where existing culverts do not allow fish to pass, replacement culverts would improve habitat availability for fish." If the JCA route is chosen, we would expect that if any "fish friendly habitat" improvements were constructed in the upstream routes that previously identified original deficient highway culverts would also be replaced. There does not appear to be a lot of common sense in improving an upstream water passage while leaving an existing impaired waterway in place downstream.

From a simple observation of your maps in the “Executive Summary”, it would appear that from mile 46.5 to mile 49.4 and especially 54.0 to mile 55.5 there are sub-standard fish passageways as noted in you EFH report. Please note that ADF&G habitat directives list all drainages that have the presence of salmonids at any time of any year as anadromous.

RESPONSE: DOT&PF is in the process of conducting wetland permitting with the U.S. Army Corps of Engineers and will further refine wetland mitigation as part of that permitting process. That mitigation will either include fee-in-lieu or permittee responsible mitigation of the type you mention to mitigate for the wetland impacts associated with the project. Additionally, DOT&PF will need to acquire permits from ADF&G for culvert replacement and installation on anadromous streams. The kinds of mitigation you suggest will be considered at that time.

Would also like to relate a short comment on the crash data supported in the “additional reports” list. The relevance to intersections and segments is misleading. The comparisons between all the routes indicate that the Juneau Creek Alternative has the least risk of an accident at an intersection. This may be true using the current data. A simple “T” is not adjusted for the speed weight and volume of unprocessed and processed volumes of salmon traveling in semi-trucks and trailers up the grade and down the grade with cross traffic, possible recreationalists and others unaware of the speed or lack of control associated with this type of commerce. It should be noted that 95% of all CI commercially caught salmon in a given year travel this route in the summer months as well as millions of pounds of Prince William Sound pink salmon and sockeye. From May through September this is in the direct timeline with other Cooper Landing activities. Consideration of this commercial activity was not evaluated in the risk assessment. Historical data from the current route with speeds of 35 mph and 45 mph will not mesh well with 55 mph or more at these two pivotal intersections. This is an accident waiting to happen and in our opinion this evaluation is seriously flawed.

RESPONSE: Consideration of truck activity has been included in the engineering analysis. The intersections will be engineered to be safe and meet the traveling needs commensurate with a NHS facility, including the kind of truck traffic you mention. The intersections are planned to have turn lanes and acceleration/deceleration lanes, and would be lit to facilitate the safe exchange of traffic between the old and new highways.

Thank you for the opportunity to comment on this much-needed project!

Paul A. Shadura II
Spokesperson for SOKI
P.O. Box 1632
Kenai, Alaska 99611-1632
sabaka@ptialaska.net

ID: 1534 **Source:** Web **Date Submitted:** 4/17/2018
Name: David Zimmer
Organization:

Please include a bicycle/pedestrian path along side and separated from motor traffic for the safety of people who wish to walk or bicycle. Safely should be the top priority for this project, and if this new transportation route is not safe for all, then it is not safe at all.

Many of the visitors to the Kenai Peninsula are on bicycles. It does not reflect well on Alaska state highway planners to leave bicycle riders and pedestrians out of the plans for safe transportation infrastructure. Please include a separate bike/pedestrian path in the Sterling Highway Project. Thank you. --David Zimmer

RESPONSE: Each of the build alternatives have been designed with an 8-foot shoulder, which meets the safety requirements for bicycles and pedestrians along a rural principal arterial highway. Given the level of bicycle and pedestrian activity on the highway outside of Cooper Landing, DOT&PF believes the wider lanes and shoulders would sufficiently increase safety for pedestrians and bicyclists along the new highway segments. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway.

ID: 1536 **Source:** Email **Date Submitted:** 4/15/2018
Name: Cheryle James
Organization: Wildman's

My comments on the bypass in Cooper Landing Cheryle James

RESPONSE: See response below at ID 1537.

ID: 1537 **Source:** Email **Date Submitted:** 4/17/2018
Name: Cheryle James
Organization: Wildman's

April 15, 2018
Sterling Highway MP 45-60

My family has owned property in Cooper Landing since 1954 and I have been a full time resident since 1990.

The bypass in my opinion is not a responsible use of public money. The state has wasted 30+ years of my federal tax dollars on an ongoing Environmental Impact Statement. The suggested route will cost 280 million dollars plus since I am sure that there will be some overrun due to lack of anticipation of the engineers in design problems. That money should be used for example to build the Knik Arm Bridge to alleviate the traffic to the valley. The State of Alaska is crying poverty so if we have to match 10%, use my tax dollars & oil revenues where the money should benefit the State the Most. Cooper Landing has major traffic 3 – 4 months out of the year not like the daily traffic from Anchorage to the valley.

REPSONSE: The programming of projects, including this one, goes through a rigorous statewide evaluation and ranking process, which is ultimately approved by the DOT&PF Commissioner and FHWA. This project will be funded by approximately 90 percent federal funds and will be phased in over time. A draft financial plan is included in the Final EIS (Appendix H) that provides additional details on how the project is proposed to be funded.

It distresses me that the town has not been given consideration to the effects of the business that will be routed around current merchants. As an owner of a business that stays open year round, I strive to meet the needs of my customers. The by-pass will direct my year round business away from me yet there is nothing to help enhance Cooper Landing as a destination spot. You are able to build a bridge over Snow River with our project funds but yet, we have a safety path that we would love to have enhanced so our visitors and residents can safely bike or walk from Sunrise to Mile 50. It would be an asset to extend that safety path to the Russian River Ferry for example, yet there was no concern about our town. Yet, you can do a land swap with CIRI, the Chugach National Forest and set aside money for wet lands to be used where needed but nothing for our small community.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the "safety trail") that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted by the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the "safety path" that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

Our concerns about maintenance on the existing road were not addressed but basically we are told it would be a State maintained secondary road, which, from experience means, whenever they can get to it. Another concern it that they truckers will be using their jake brakes going north and south so the sound echoing in the valley is going to be disturbing and obnoxious.

RESPONSE:DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources

We have a volunteer EMS and fire department which up to now is self-supporting. This additional road will put an additional strain on those volunteers and resources.

RESPONSE: Fewer and less severe crashes are predicted to occur if the Juneau Creek Alternative is constructed as compared to doing nothing. The crash analysis indicates that 10.9 fatal and injury crashes per year would occur in 2043 under the No Build Alternative, while 3.3 are predicted under the Juneau Creek Alternative. Based on the crash analysis, the economic burden to the community to provide emergency response will decrease.

Several people on the south side of the valley get their water from the natural streams and there doesn't seem to be a concern that their water sources will be disturbed and possibly contaminated.

RESPONSE: The effects to water sources is described in Section 3.13 of the Final EIS.

It also disturbs me when it is discussed that the lanes are narrow in Cooper Landing when it was the State that painted extra space between the double yellow lines and moved the guardrails closer to the

white line when they redid the road a few years back. The explanation was to slow people down and now it is being used as an excuse for the bypass. This is the Sterling Highway the same highway that runs through Sterling, Soldotna, Ninilchik, and Anchor Point. Each of those towns has reduced speed limits through these towns. We also got the excuse that the safety of locals and travelers through Cooper Landing will be enhanced as there won't be driveways and business access on the new road. What a crock that statement was as you have driveways and businesses turning on and off in all those towns. Yes they have turn lanes in Sterling and Soldotna but not that many further south and you have streets and driveways turning on the off the highway.

RESPONSE: The Sterling Highway MP 45–60 project was started long before the recent repaving project. The recent paving project attempted to make a safer road given a limited scope, recognizing that this EIS was nearing completion. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the remaining old highway would be reclassified to function as a minor arterial or major collector. With less traffic, and traffic that is primarily destined for local Cooper Landing destinations, the remaining existing highway through town would safely function to provide access to adjacent properties.

Several of your designs required that the road be improved between mile 45 & 47 (straightening the curves) and fixing the road from about Mile 51. It would be a better use of our tax dollars to fix the curves at mile 45-47, then fix the existing road by widening it, putting in pull outs and the section between mile 47 to 51 post the speed limit to 35 and enforce.

RESPONSE: Each of the alternatives includes identical improvements at each end of the project. DOT&PF and FHWA re-examined the stated purpose of the project, took an additional look in the Final EIS at the suggestions like those suggested above, and have reaffirmed that attempts to find an alternative that use the existing alignment throughout would not satisfy the project purpose and need and/or would be not feasible based on sound engineering practice. The results are reported in Chapter 2 (Section 2.5.1) of the Final EIS. In short, issues remain in this area that result in the alternative not meeting the project purpose and need or in engineering feasibility problems. The physical issues of roadway geometry and unstable bluffs coupled with the traffic engineering issues mean this alternative is not reasonable. See also the response to Comment Group 56 in Appendix J (*Comments and Responses on the Draft SEIS*) of the Final EIS.

Our community has been concerned about a truck accident for the past 30 compromising the river. It doesn't have to be on the backs of residents and businesses when to date the few accidents we have had with trucks has not compromised the River.

RESPONSE: Risks to the river are documented in Section 3.17. For the Final EIS, a new crash analysis was added to Appendix A. That analysis predicts a 69.7 percent reduction in crashes if the Juneau Creek Alternative is built, compared to the No Build Alternative. Truck crashes were also estimated for the design year (2043) with 2.8 crashes predicted for the No Build Alternative and only 1.1 estimated for the Juneau Creek Alternative in 2043. Other data was also added to the Final EIS to disclose the potential impacts of spill risk into the Kenai River. Section 3.17 documents spill risk and discloses the time it would take for spills to reach the Kenai River. Because it has more of its alignment farther from the river, spills that would occur along the Juneau Creek Alternative alignment take longer for the material to reach the Kenai River (See Map 3.17-2 in the Final EIS).

If feel this whole exercise regarding the bypass has been a major waste of money, the only reason the EIS is finalized is the fed's threatening you to make a decision or pay money back, and our State

Government not thinking about projects in order of priority of need in our state.

Cheryle James
Wildman TR Inc. Owner

ID: 1538 **Source:** Web **Date Submitted:** 4/17/2018
Name: Robert L. Baldwin
Organization:

FOCL is submitting an amendment to our previous comments submitted April 16. See the attached...

Attached text follows:

FOCL Established 1996

Friends of Cooper Landing, Inc.
P.O. Box 815
Cooper Landing, Alaska 99572-0815
907-250-3913
kenailake@arctic.net

April 16, 2018 (Item 3 amended April 17)

Sterling Highway MP 45-60 Project
DOT&PF Central Region
P.O. Box 196900 (emailed: www.sterlinghighway.net
Anchorage, AK 88519-6900

RESPONSE: This letter is a duplicate of ID 1515. See ID 1515 for responses.

Dear MP 45-60 Project Team:

The Friends of Cooper Landing (FOCL) are pleased to submit comments about the Final Environmental Impact Statement for the Sterling Highway 45-60 Bypass Project (Bypass). FOCL functions to represent the best interests of Cooper Landing.

All Bypass alternatives cause impacts in Cooper Landing. These comments are intended to mitigate impacts that will result from the mandated Juneau Creek Alternative. Concerns about impacts are addressed in following topic areas

1. Trail Continuity. Cooper Landing is a community of walkers and hikers. It is very important to maintain continuity of existing trails and walkable pathways along roads. Access to safe trails and pathways is a routine part of the Cooper Landing lifestyle.

Trail heads, parking areas, and safe pedestrian crossings must be continued or provided by the Bypass project. Trails and pathways of primary importance are:

1A. Resurrection-Juneau Creek Trail
1B. Slaughter Gap Trail
1C Old Sterling Hwy, “Our Point of View road” pathway uphill from MP 45.0 to 45.5

2. Wildlife Corridor Continuity. A wildlife habitat corridor exists from Cooper Creek across the valley to Juneau Creek, and is used bears and ungulates. The Bypass project must provide safe wildlife crossings.

3. Quartz Creek Road Intersection. The MP 45.0 intersection must be safely designed in all respects, including safe pedestrian crossings, turning vehicles, and reduced vehicle speed. Quartz Creek Road access westbound requires a left-turn lane and access downhill east-bound a right-turn lane.

April 17 addendum: Turning vehicles traveling to and from more westerly central Cooper Landing must also be accommodated at this intersection.

It appears necessary to somewhat reconstruct Quartz Creek Road approaching the intersection. The Quartz Creek Homeowners Association is concerned that residential properties on Quartz Creek Road must not be negatively impacted. Also, adequate intersection lighting is necessary, but the Quartz Creek Homeowners’ Association does not want residences to be directly illuminated.

Sincerely,
/s/ Robert L. Baldwin, President

ID: 1539 **Source:** Email **Date Submitted:** 4/13/2018
Name: Andy Loranger **Title:** Refuge Manager
Organization: USFWS

United States Department of the Interior
KENAI NATIONAL WILDLIFE REFUGE
P.O. Box 2139
Soldotna, Alaska 99669-2139
(907) 262-7021

IN REPLY REFER TO:
18019ajl

April 13, 2018

Mr. John Lohrey
Statewide Programs Team Leader
FHWA - Alaska Division
P.O. Box 21648
Juneau, AK 99802

Dear Mr. Lohrey:

Enclosed please find the U.S. Fish and Wildlife Service's (USFWS) comments on the Sterling Highway MP 45-60 Final Environmental Impact Statement (FEIS) and Final Section 4(f) Evaluation.

There continue to be certain issues that we believe are critical to address prior to the Record of Decision (ROD) being finalized on wildlife mitigation, in terms of potential impacts to fish and wildlife, and their habitats, both on and off the Kenai National Wildlife Refuge (Kenai NWR), as well as noise and public use impacts. Given the potential magnitude for the MP 45-60 Project's direct, indirect, cumulative and long-term impacts to wildlife resources, the mitigation commitments outlined in the FEIS are still inadequate.

In early December 2017, the interagency wildlife working group for the MP 45-60 Project met in Anchorage to discuss the results of the report "Habitat use and movement patterns of focal species on the Kenai Peninsula, Alaska" as well as associated mitigation for the Project. At that meeting, we discussed two overpasses and two underpasses as mitigation for impeded wildlife movement on the Juneau Creek Alternative. However, in the FEIS, one of the overpasses (#23 in the Juneau Creek Alternative) was dropped because there was concern that oversize vehicles that might have a problem with the tunnel could not use the old route. Instead, the FEIS recommends a wildlife underpass at site #22 in the same general area. The FEIS now recommends for the preferred alternative (Juneau Creek) three dedicated underpasses and one dedicated overpass over the 15-mile Project area:

- 18-ft H x 23' W culvert under 3-lanes along a Bean Creek tributary (~MP50, #9)
- 130-ft wide overpass over 3-lanes east of Round Mountain (~MP54, #20);
- 18-ft H x 23' W culvert under 3 lanes below Round Mountain (MP: 56.3, #22)
- 15-ft H x 23' W culvert under 2-lanes at Fuller Creek (MP 57.2, #24)

As currently proposed, all four structures are less than ideal from a wildlife perspective. Although #9 and #22 are both 18-ft high, considered the minimum design height for moose based on discussions with ADF&G in Anchorage, their dimensions are compromised by the fact that they are being installed under 3-lane sections of the highway. While the structure at #24 is under two lanes, it is only 15-ft high and so does not serve well for moose. The 130-ft wide overpass at #20 could have great value for large mammals, specifically ungulates such as moose; however, the FEIS cautions "these crossings may conflict slightly with future ramps that could be built by the Borough to access SMU 395, which should be considered during the final design".

RESPONSE: The dimensions given above are minimums, and the EIS does not specify that they would be “culverts.” The structure type has not been selected, and will be determined during design. The EIS states commitments to work with wildlife agencies to refine wildlife crossing locations and designs during the final design process.

The proposed bridge over Juneau Creek offers great potential for wildlife mitigation. However, as we indicated in previous correspondence, the 200-ft buffer on either side of the creek is compromised by rerouting the Resurrection and Bean Creek Trails to pass on both sides of the creek under the bridge, thereby increasing the likelihood of negative human-wildlife encounters including bear killings in defense of life or property (DLPs). A recent opinion piece by Rick Sinnott, retired ADF&G biologist, in the Anchorage Daily News (3/31/2018) expressed exactly this concern about designing bike trails to coincide with bear movement corridors in the Anchorage basin.

RESPONSE: The mitigation for the bridge, negotiated with the Forest Service, was to avoid wildlife impacts by keeping bridge piers and construction equipment out of the canyon and to use the Resurrection Pass Trail and Bean Creek Trail to be able to create a loop trail system using the bridge. DOT&PF and FHWA are aware of wildlife issue and have proposed that the abutments for the bridge be set back 200 feet from the edge of the canyon. To minimize the potential for bear-hiker conflicts, the Bean

Creek Trail will be moved as close to the abutment as practical to maximize the remaining corridor for wildlife. Additionally, DOT&PF and FHWA have added a wildlife crossing structure east of the proposed Juneau Creek Bridge to improve opportunities for wildlife passage and to reduce conflicts associated with human uses. DOT&PF and FHWA are committed to working with the wildlife agencies during final design to ensure the greatest usability of the dedicated wildlife crossings.

We remain concerned about the wildlife mitigation currently proposed in terms of designing this Project to accommodate structures truly "dedicated" to wildlife. Referencing the FHWA Wildlife Crossing Structure Handbook (2011), cited on page 3-478 in the FEIS as providing expert guidance, this document also states "the spacing interval [for large mammal projects] varies from one wildlife crossing per 0.9 miles to one crossing per 3.8 miles ... wildlife crossings are variably spaced but on average [are] about 1.2 miles apart." This same document also suggests that it is better to have more crossings in a relatively intact landscape (such as the MP 45-60 Project area) than a highly fragmented one. With those recommendations in mind, the MP 45-60 Project should have 10 wildlife mitigation structures incorporated into the Project design.

RESPONSE: The highway currently has no wildlife crossing structures. The overall traffic volume would not change under the Juneau Creek Alternative. In addition, the volume would be split between two roads over approximately 10 miles in the project area, so the new highway would carry approximately 70 percent of today's highway traffic, and that traffic would have improved site distance and maneuvering room. This will create an improved condition for crossing the highway. The FHWA *Wildlife Crossing Structure Handbook* provides guidelines. Based on the specific modeling completed for this project, wildlife crossing structures are not warranted every 1.2 miles. The modeling, camera work, and crash data suggests that Kenai Lake, the community of Cooper Landing, and the steep terrain limit where animal movements occur.

DOT&PF and FHWA recognize that your agency has concerns about the number, placement, and design of the proposed wildlife crossing structures. We address each of these issues in responses to specific comments on structures below. DOT&PF has added an additional structure as requested, and will evaluate the design and locations as part of final design with input from your agency, USFS, and ADF&G. We have consistently stated that the specific locations and final design of wildlife crossing structures will be determined during final design. We will continue to coordinate with your agency as design engineering and monitoring occurs.

There is a need to reconsider the design of the four structures proposed in the FEIS, as well as installation of additional structures elsewhere. With respect to the four proposed wildlife crossing structures:

- Underpass #9 should be increased to 32-ft in width;

RESPONSE: The opening width was identified as a minimum of 23 feet, and the proposed structures would be designed as close to 32 feet wide as possible. Structure details, including size, will be determined in final design.

- For overpass #20, it is critical that mitigation include deed or right-of-way restrictions that simply do not allow off/on ramps to be permitted for this area;

RESPONSE: Analysis of potential access to State Management Unit 395 directly from the Juneau Creek alternatives was undertaken at the request of the Forest Service because they indicated impacts to

Forest resources could be reduced via direct access. DOT&PF and FHWA have consistently stated a preference that access should come from the existing highway, which in the future would be a collector road or minor arterial more suited to providing local access. DOT&PF and FHWA believe the decision on whether to grant the access via ramps will primarily lie with the Forest Service because it is our understanding that the Forest Service will retain an easement for the Forest roads that pass through Unit 395. Thus, to obtain access rights to use that easement, the Borough would require a decision by the Forest Service, requiring additional NEPA evaluation (either a separate document or tiered to this document). The Sterling Highway MP 45–60 Final EIS evaluates both options (access via ramps and access via the old highway) as reasonably foreseeable, but leaves the potential open for either choice. DOT&PF and FHWA will work with the Forest Service if/when an access request is made by the Borough. Given the public expense of putting in the wildlife overpass, DOT&PF and FHWA are committed to maintaining its functionality for wildlife use, and that will be a key consideration if and when the Borough requests access.

- Underpass #22 is supposedly located at MP 56.3. The description in Appendix "I" says that this is a 3-lane section of highway; however, the revised map on page 2-53 clearly indicates this section as 2-lane.

Either way, this underpass should be located within a 2-lane section and, if necessary, the 3-lane section truncated prematurely. Further, the width of the underpass should be 32-ft wide if at all possible;

RESPONSE: DOT&PF and FHWA have committed to re-examining passing lanes in KNWR during design to adjust where they occur. It is possible this location could be narrowed to shorten the wildlife crossing. The widths given are minimums. The width could be established at 32 feet wide, depending on the precise structure type decided upon in final design. The exact size and shape of the wildlife crossings and the exact location of passing lanes is to be determined during final design. DOT&PF and FHWA are committed to working with the wildlife agencies to ensure the greatest usability of the dedicated wildlife crossings, and will consider refinement to the design to minimize the distance the wildlife need to cross (by shifting the taper or using wing walls or other design techniques). As the project moves into the design stage, these issues will be re-examined. In general the crossing locations are limited due to the area topography, wildlife movement data, and the presence of sensitive cultural and environmental resources.

- Underpass #24 should be as high as possible (ideally 18-ft) to accommodate moose.

RESPONSE: DOT&PF concurs. It is DOT&PF and FHWA's intention to achieve 18-foot height wherever possible. At this location (Fuller Creek crossing), preliminary design data indicates it is not possible without affecting access to the trailhead for Fuller Lakes Trail, which FHWA has determined is protected from use by a transportation project (Section 4(f) property). The site is identified as primarily a bear crossing location. DOT&PF and FHWA are committed to refining the location and design of wildlife crossings during final design. With final survey data, it may be possible to raise the height of the crossing.

With respect to two (2) new structures, we strongly recommend two (2) additional wildlife crossing structures to help mitigate the effect of this highway on wildlife movement. An 18-ft H x 23-ft W culvert or a small bridge (preferred) should be installed at #10 on Bean Creek. The FEIS indicates this site is unnecessary because it is so close to the Juneau Creek bridge but, for reasons stated elsewhere, we do not consider the larger bridge suitable mitigation (and, in fact, may create future wildlife-human conflicts).

RESPONSE: DOT&PF and FHWA considered your comments on the proposed wildlife movement

corridor under the Juneau Creek Bridge and agree to install a wildlife underpass crossing at site #10 on Bean Creek. As with all the wildlife crossings, refinement of the location and design of the crossings during final design, with the input of wildlife agencies, is a commitment in the EIS.

We also strongly recommend an overpass at the east end of the Project. DOT&PF/FHWA considered an overpass at MP 44.3-44.8, but discounted the value of this overpass because of the proximity of the airport and landfill. However, an overpass at MP 43 would funnel wildlife directly into Quartz Creek at the confluence of Crescent Creek, allowing them to travel from Devil's Creek and Russian Gap to Crescent Lake and the north shore of Kenai Lake. This proposed crossing also has fewer conflicts with private parcels than the site previously analyzed. The MP 43 site was identified based on previous work done in 2010, in conjunction with the USFS, to assist the Cooper Landing community with local planning efforts. The study "Delineation of Landscape Linkages in the Cooper Landing Planning Area" identified undeveloped areas within their Planning Area that could be designated and/or enhanced as corridors to maintain connectivity of the natural landscape between Federal lands adjoining the Sterling Highway. In addition, east-west linkages were pinpointed through developed areas on either side of Kenai Lake.

RESPONSE: The MP 43–44 area has been previously discussed. However, it is outside the project area. In addition, a wildlife overpass anywhere between MP 43 and 47 presents the same issues as a wildlife overpass near the western end—there is no alternate route for oversize vehicles.

Lastly, we ask that DOT &PF/FHWA reconsider the #23 overpass in the Juneau Creek Alternative. In recent correspondence with Dr. Tony Clevenger (Western Transportation Institute, Montana State University, Bozeman), he states that all overpasses now have the standard 5.4 m clearance to allow trucks, even oversize, to pass through. Further, he states, "this is an engineering issue, not a wildlife issue, and engineers don't have any problems designing an overpass so that the required vehicles (even oversize) can pass through."

RESPONSE: Most locations in the Lower 48 are not restricted to one road only, so alternative routing options are usually available for oversize loads. In this location, the Sterling Highway provides the sole means of surface access—there is no other option. DOT&PF does not intend to provide a wildlife overpass that would result in a tunnel for vehicles where there is only one road.

In total, the USFWS has identified 7 wildlife crossing structures, 3 overpasses and 4 underpasses to address the substantial, adverse impacts to fish and wildlife and their habitat. With the exception of the MP 43 overpass, the 6 wildlife crossing structures referenced above were all based on the modeling results of the Suring et al. 2017 wildlife mitigation study as well as other relevant information.

Considering the extent of the habitat fragmentation, displacement, and potential for wildlife-vehicle collisions identified in the FEIS, we believe these crossing structures are the minimum necessary to achieve the desired outcome.

RESPONSE: DOT&PF and FHWA have invested a substantial effort to develop a mitigation plan to accommodate wildlife movement for this project. The plan has been the subject of many comments and meetings. At the last meeting with wildlife agencies, agencies indicated general satisfaction with the mitigation proposal and did not indicate that the proposal was “inadequate” or that other crossing structures should be added in the project area. (USFWS suggested examining a site east of the project area near MP 43–44). The one change to the mitigation proposal since that meeting was that DOT&PF indicated overpass #23 could not be built due to accommodation of oversize vehicles. In place of that crossing, the EIS indicated that underpass #22 would be built, and Appendix I (*Wildlife Crossings*

Analysis and Recommendations) stated that it may be possible during design to make that underpass wider than the standard 23 to 32 feet (likely requiring a bridge structure) or to include two crossings at site #22 to help make the crossing more “open” and accessible to animals. In response to the request from USFWS and the Forest Service, DOT&PF and FHWA have agreed to add an additional wildlife crossing structure (#10, east of Juneau Creek). DOT&PF and FHWA are committed to refining the locations and configuration of all wildlife crossing structures during final design.

The attached USFWS Comments should be treated as "supplemental" to those previously provided in December 2017, February 2017, May 2015, and October 2014. We support continued coordination with all pertinent resource agencies in order to assist with the development of an acceptable Wildlife Mitigation Plan that will adequately address anticipated impacts to fish and wildlife and their habitats.

We look forward to continued coordination as a Cooperating Agency and request to be included in all relevant discussions with the Project Design Team on the Sterling Highway MP 45-60 Project.

Sincerely,
Andy Loranger
Refuge Manager

Attached text follows:

Enclosure

April 13, 2018 USFWS Comments - Sterling Hwy MP 45-60 Final EIS EXECUTIVE SUMMARY

Pg. 1 One of the goals is to improve highway safety and under the Section entitled "Why favored?" it states that ..... With a new highway route, a segment of the old highway would remain as a scenic road suited to serving local and recreational traffic.

Pg. 6 under "Need 3: Improve Highway Safety", it indicates the combination of narrow lanes, narrow or non-existent shoulders, sharp curves, and a high number of access points result in safety issues. It goes on to say, the crash rates and the severity of those crashes on some segments are higher than the statewide average for similar types of roadways.

Pg. 20 states that under the Juneau Creek Alternative (JCA), 70% of the Sterling Hwy traffic is expected to use the new highway, leaving the old highway through the 4-mile core area (Cooper Creek to Russian River) as a quieter, winding, local road suited to providing access to that area's multiple recreational amenities.

FWS Comment: As we've requested in the past, if the goal is to improve safety and maintain the old highway as a "scenic" road, the speed limit should be reduced on the "unimproved" segment of the old highway along the Kenai River. This should also help to minimize wildlife-vehicle collisions.

RESPONSE: Text in Section 3.6 (Transportation) of the Final EIS addresses this issue. DOT&PF committed in Section 3.6.2.2 (Mitigation) to examine the functional classification of and the appropriate speed limits for the “old” highway, and to set new speed limits as warranted. It is anticipated that the “old” segment would be reclassified as a collector or minor arterial. While any adjustments to speed limits would likely be to lower them, they would be set according to the analysis and DOT&PF guidance.

Pg. 20 Mitigation Measures - Under the JCA, a falls overlook would be added in the Juneau Falls Recreation Area and a pedestrian walkway would be added to the highway bridge to connect trails on either side of the canyon.

FWS Comment: While the proposed bridge over Juneau Creek offers the "potential" for wildlife mitigation, the 200-ft buffer on either side of the creek (and under the bridge) will be compromised by the rerouting of the Resurrection and Bean Creek Trails to pass under the bridge.

As recommended in our Dec. 2017 Cooperating Agency Comments, rerouting Bean Creek Trail further to the east, so that it passes through a pedestrian culvert closer to its current route, would allow the east side of Juneau Creek (under the proposed bridge) to serve as an "unimpeded" wildlife corridor. Otherwise the value of this location for wildlife movement will be substantially diminished and the bridge cannot be considered as a wildlife mitigation measure.

RESPONSE: See the response above regarding routing the Bean Creek Trail under the Juneau Creek Bridge. Also, the Forest Service, the agency with jurisdiction over both trails in this location, has considered this request to reroute the Bean Creek Trail further east and requested in comments on the Final EIS that the trail routing remain under the Juneau Creek Bridge.

If that is the case, excluding the bridge, there are "'4.5 miles between Wildlife Crossing No. 20 overpass and No. 9 underpass that remain, without a wildlife crossing structure (WCS). This area should be seriously re-evaluated in terms of wildlife passage and movement corridors. Additional crossing structures should be constructed considering the severity of the habitat fragmentation, displacement, and potential for wildlife-vehicle collisions identified in the FE/5, due to an additional highway being placed on the landscape.

RESPONSE: DOT&PF and FHWA have agreed to add an additional wildlife crossing structure at the headwaters of Bean Creek (site #10), as suggested by both the Forest Service and USFWS, to provide another passage for wildlife in this portion of the project area.

WETLANDS/OTHER WATERS IMPACTS

FWS Comment: On Pg. 23 of the Executive Summary it indicates that DOT&PF has committed to paying an in-lieu fee to compensate for the unavoidable impacts to wetlands and waters of the U.S. and to offset wetlands loss. As the in-lieu fee program does not currently exist on the Kenai Peninsula, nor is there a timeline for when that may change, we request that Permittee-responsible mitigation include additional, adequate ratios to address out-of-kind compensation and further thought be given to incorporating more wildlife crossing structures for moose and bear, as well as mitigation efforts to benefit the local Cooper Landing community.

Because of the extensive wetland impacts anticipated in conjunction with the JCA, opportunities to acquire lands adjacent to the Kenai River and its tributaries for conservation easements should be considered.

RESPONSE: DOT&PF and FHWA are aware that an in-lieu fee provider is not available at this time. If one is still not available prior to permitting, DOT&PF will prepare a permittee-responsible mitigation plan during permitting. DOT&PF is working with the U.S. Army Corps of Engineers on a mitigation plan and will consider these suggestions during development of that plan.

RISKS TO WILDLIFE

Pg. 3.475 "Behavioral changes due to human activity associated with new highway segments may also impact population sustainability .... Increased road density on the landscape may result in brown bears avoiding-in part or completely-certain crossings, as bears are less likely to cross in areas with two parallel roads than one road."

Pg. 3-476 "Human food-conditioning of bears likely would increase with increased traffic and human use of the area. All build alternatives are likely to have impacts on brown bear mortality through changes in the probability of DLP kills and vehicle collisions. Increased road density was the primary factor influencing the change in probability of DLP kills among the build alternatives. Dispersed recreation originating with a new highway alignment and new trailheads along each new alignment would be a change that could lead to increased encounters and DLP kills and possibly to increased poaching, especially where new alignments are farthest from existing subdivisions and other regularly occupied areas."

Pg. 3-561 The FEIS states that building the JC Bridge could increase the amount of recreation day use, which in turn could increase potential negative effects on vegetation and potential disruption of wildlife use of habitat in that specific area.

FWS Comment: Unless the Bean Creek Trail is re-routed further to the east and passes through a pedestrian culvert placed closer to its current route, the JC bridge underpass' overall use by wildlife will decrease and the potential for negative wildlife-human interactions will increase. Both factors substantially reduce the value of this undercrossing as mitigation.

RESPONSE: The Forest Service, the area land manager, has expressed its preference for the proposed Bean Creek Trail reroute to remain under the bridge because it provides a loop trail system. The routing of the trail, which is historic, has also been consulted on and agreed to through a Programmatic Agreement with consulting parties (Appendix K of the Final EIS). USFWS is a signatory to that agreement.

DOT&PF and FHWA propose to add an additional wildlife crossing structure at the headwaters of Bean Creek (site #10) to improve wildlife passage and reduce risks for wildlife-human interactions.

Pg. 3-589 "DOT&PF would reserve access rights for the segment of each build alternative built on a new alignment, so only the limited number of side roads or driveways noted in Chapter 2 would be permitted .... This would prevent the project build alternatives from inducing the growth changes that would cause further habitat fragmentation and wildlife movement constriction as an indirect result of the project ... although such impacts are considered reasonably foreseeable regardless."

Pg. 3-590 "New segments of roadway likely would be a partial barrier to moose movement. DOT&PF would retain access rights along the segment of each of the build alternatives that would be built on a new alignment, so no additional side roads or driveways would be permitted."

FWS Comment: This is somewhat confusing, considering on Pg. 3-552 it states that access could occur at one or both of the overpasses where the highway passes over West Juneau Road, via ramps in a diamond interchange configuration. The FEIS further assumes that there would be four ramps at each intersection, with off-ramps, each estimated at about 1,200-feet long, and with on-ramps at about 2,900-feet long.

Please clarify exactly how many side roads/driveways are going to be allowed and/or specify exactly where in Chapter 2, this information can be found. Also, the cumulative effects verbiage on Pg. 3-590 should be revised to reflect that some side roads will be permitted. If this is an accurate statement, this chapter should address the potential for strip development, etc.

RESPONSE: DOT&PF would retain access rights, so no additional side roads or driveways would be permitted other than those potential connections identified in Section 2.6.5.2 of the Final EIS. The maximum number of permitted connections noted in Section 2.6.5.2 for the Juneau Creek Alternative is five (one pullout and one trailhead driveway to be built as part of this project, two potential future diamond interchanges at State Management Unit 395, and one potential future entrance to CIRI Tract A). It is highly unlikely that both interchanges would be built, and is possible none of the "potential future" connections would be built.

FHWA preferred to commit to refusing any connections, but access to CIRI Tract A was a commitment in the Russian River Land Act agreement approved by Congress, and the Forest Service requested that possible connections be evaluated in the EIS. DOT&PF and FHWA have consistently stated a preference that access should come from the existing highway, which in the future would be a collector road or minor arterial more suited to providing local access. DOT&PF and FHWA believe the decision about whether to grant the access via ramps will primarily lie with the Forest Service, because it is DOT&PF and FHWA's understanding that the Forest Service will retain its easement for the Forest roads that pass through Unit 395. Thus, to obtain access rights to use that easement, the Borough would need a decision by the Forest Service, requiring additional NEPA evaluation (either a separate document or tiered to this document). Because this potential access is not being built by the project, and because some means of access is reasonably foreseeable, access options have been evaluated for cumulative impacts. The Sterling Highway MP 45–60 Final EIS evaluates both options (access via ramps and access via the old highway) as reasonably foreseeable, but leaves the potential open for either choice.

The EIS states that commercial/strip development would not occur on Unit 395 because the state plans to reserve a 100-foot buffer strip on each side of the highway right-of-way. This is also indicated in the *Kenai Peninsula Borough Comprehensive Plan*. Ideally, the Final EIS (see page 3-590) would have better clarified what is meant by "no additional side roads or driveways would be permitted." The intent was "no additional" beyond those identified in the EIS (e.g., Section 2.6.5.2).

We previously commented that the JCA, in combination with residential development of Unit 395, would have the greatest overall impacts on brown bears and other wildlife species due to greater habitat alteration, fragmentation of movement corridors, and increased mortality from vehicle collisions and OLP kills. With the likelihood of access occurring at both of the overpasses and the additional 20-ft wide (top width) lanes as noted above, these additional on and off-ramps are in essence, side roads, entering and exiting the highway and would be further impediments to wildlife trying to cross the highway. The statement that no additional side roads would be permitted should be changed to better reflect the addition of these on and off-ramps, especially since this may require use of land outside the highway right-of-way.

RESPONSE: Section 2.6.5.2 of the Final EIS describes the potential for driveways and ramps. However, as indicated on page 3-552 in Section 3.27, the ramps are evaluated as a hypothetical access to State Management Unit 395 because the Forest Service requested such analysis. DOT&PF considers it not "likely" that ramps would be built at both locations and possibly no ramps would be built at all. What is reasonably foreseeable is that some access to Unit 395 will be needed and will be built, even under the No Build Alternative. There is the potential the Borough could, in the future, request ramp access from the

Juneau Creek Alternative, but the cost is likely to be an impediment to building ramps at both locations. DOT&PF envisions any such ramps as essentially parallel to the main highway for connection with the road that crosses under the highway. The intersection of two roads would not be the most likely place for wildlife to attempt to cross, even without ramps, but DOT&PF and FHWA acknowledge that additional paved ramp lanes would amount to a cumulative loss of habitat and an incremental impediment to wildlife movement. In the future, an analysis would be required by FHWA for connection to the NHS in an area of controlled access and/or by the Forest Service for connection across National Forest land and for connection to the Forest Service road easement. For the purposes of the current project, those efforts are hypothetical, but some form or access was considered reasonably foreseeable.

Pg. 3-476 "Bear-vehicle collisions likely also would be reduced on any "old" highway segments not incorporated into a build alternative because those segments would become a local road with only about 30 percent of the total traffic volume."

FWS Comment: local traffic along the existing Sterling Highway during the summer and fall months will continue to occur at high levels as the major recreational attractions along the Kenai River will continue to be the destinations of many travelers to the area. This statement is conjecture without sufficient supporting data or evidence and should be removed.

RESPONSE: The traffic split is based on a study of actual traffic in the project area. Approximately 30 percent of traffic was determined to be traffic that stayed in the project area, presumably accessing local destinations, and approximately 70 percent was through traffic that passed quickly through with little or no stopping. The split is used as an approximation throughout the EIS for multiple topics and is used consistently across the alternatives to allow for comparison among alternatives. While the number is not precise, given that it is based on a specific study of actual traffic in the corridor to derive a projection about future traffic, it is not conjecture.

DOT&PF data indicate a correlation between higher traffic volumes and greater potential for wildlife related crashes. DOT&PF and FHWA believe it is reasonable to conclude that such substantial reductions in traffic (70 percent less) on the “old” highway “likely” would result in reductions in wildlife collisions on the “old” highway. Section V the ROD reflects that USFWS, which has special expertise in wildlife management, believes otherwise.

Pg. 3-479 "For this project, DOT&PF would use large mammal underpasses with horizontal clearances of 23 feet to 32 feet, depending on structure type, and with vertical clearances of 18 feet, where feasible."

FWS Comment: large mammal underpasses must be of a type and size that will ultimately result in the highest potential for use by the targeted species, in order to be considered as adequate mitigation. Therefore, these structures must have the full vertical clearance of 18-ft, and the words "where feasible" should be removed.

RESPONSE: “Where feasible” addresses that the proposed large mammal underpass at Fuller Creek may not be able to achieve 18-foot vertical clearance without encroaching on the Fuller Lakes Trailhead. Survey and final design engineering will provide the needed data regarding the vertical clearance possible for the wildlife undercrossing. The qualifying statement was made in the EIS because it was considered important to avoid Section 4(f) resource impacts, and the location would primarily serve black and brown bears, which require less vertical height than moose. Achieving the 18-foot vertical clearance may require raising the grade and placing fill toward the Fuller Lakes Trailhead, a Section 4(f) property. Should USFWS consider alteration of the trailhead coupled with addition of the wildlife crossing as an

enhancement to the KNWR as a whole, then there would likely be more flexibility and opportunity to achieve the desired height.

Pg. 3-480 "All alternatives include a large mammal underpass at Fuller Creek, near MP 57.2. This underpass would have its own set of impacts that are not necessarily accounted for elsewhere in the EIS."

FWS Comment: The FEIS indicates the fill footprint of the highway will expand, compared to the base preliminary plan, which also increases vegetation impacts. Please specify the anticipated extent of additional fill impacts and vegetation clearing associated with this activity.
In addition, a disruption of the anadromous stream is to occur, resulting in anticipated habitat disruption for a period of a couple of years. This determination is concerning, considering Fuller Creek is an important tributary to the Kenai River. Please describe what measures DOT&PF intends to take to reduce the impacts to the stream and minimize the period of disruption of the habitat.

RESPONSE: The existing highway crosses Fuller Creek, which is carried underneath the existing highway in a culvert at this time. Construction of a wildlife underpass creates a larger structure and raises the highway grade. As is described, at a 30 percent design, the exact structure type has not been selected. The impacts have been described in Appendix I (*Wildlife Crossings Analysis and Recommendations*; see page 23). Engineering drawings depicting the anticipated changes can be found in Appendix I (see Sheet 27 of Appendix A of that document). The underpass would also require work in the stream, and DOT&PF would coordinate work within the stream with ADF&G during permitting to minimize impacts to the stream and fish habitat.

Preliminary design indicates that the wildlife undercrossing here, may not achieve the recommended 18-ft vertical clearance for wildlife passage. If that is the case, we recommend reevaluating this location in terms of wildlife mitigation.

RESPONSE: This location is based on specific modeling completed for the project and has been discussed over several years with USFWS. The location would primarily serve black and brown bears, which require less vertical height than moose. Based on previous consultation, DOT&PF and FHWA believed that a crossing in this location, inside an enlarged culvert, was recommended by the USFWS to not only permit wildlife passage but also to better accommodate periods of high water volume in the creek. In the second comment below, you indicate “Fuller Creek is, without a doubt, the best natural crossing for wildlife on the KNWR's section of the highway, within the project area.” The evaluation of final location and structure type to accommodate your concerns will be undertaken in consultation with your agency during final design and permitting.

Pg. 3-546 The MP 57 Project, proposes to realign approximately 2,500-ft of the existing Sterling Highway.

FWS Comment: How is the MP 57 Erosion Protection Project going to affect the design for the work at Fuller Creek? Raising the highway to accommodate the WCS could be problematic. Is there any way to shift the crossing elsewhere?

RESPONSE: Preliminary plans for the wildlife crossing structure are incorporating the proposed work for the MP 57 erosion protection project. As indicated in the Final EIS, refining the locations of wildlife crossings can be discussed during final design.

The FEIS states that the parking area for Fuller Lakes Trailhead is only about 950-ft east of the current

Fuller Creek culvert location, and that ramping the highway up for the crossing structure is to begin near the trailhead, yet no change is anticipated to either the trailhead or parking area. In addition, a westbound passing lane transitioning to an eastbound passing lane, with a short break between the two, is still being planned between MP 56.4 - MP 57. 7. The most eastern passing lanes for the Sterling Highway MP 58-79 Project are being constructed between MP 58.9 to MP 59.8, essentially between the North Skilak Lake Rd. approach and the Jean Lake Campground approach.

Only 1.2 miles separate these passing lane sections on the KNWR. We remain concerned, from a public safety standpoint, with all of the activities being planned in this wildlife pinch-point. Accommodating adequate wildlife passage on the KNWR in DOT&PF's road design for this project is crucial. Fuller Creek is, without a doubt, the best natural crossing for wildlife on the KNWR's section of the highway, within the project area. Passing lanes in this location, along with the substantial fill required to raise the roadbed on either side of Fuller Creek, in combination with the realignment of approximately 2,500-ft of the existing highway at MP 57 would increase risks to public safety and the probability of wildlife-vehicle collisions. We continue to believe that passing lanes in this area are not necessary to meet project objectives and are not desirable for the above reasons.

RESPONSE: DOT&PF and FHWA understand that your agency has consistently questioned the need and placement of passing lanes within this area. DOT&PF continues to believe they are necessary according to traffic modeling to achieve a desired level of service. The exact starting and tapering of the passing lanes can be refined during final design to make this wildlife crossing as effective as possible. The roadway, passing, and trailhead access will be designed to meet standards and will be completed during final design.

Pg. 3-490 "The Juneau Creek Bridge would be a long, high bridge that would provide relatively free wildlife movement beneath it." With the anticipated high public use afforded on the trails with the new public access from the bridge, this statement is inaccurate. Wildlife movement would be impeded by public use and the very real likelihood of human-wildlife encounters would negate the intended mitigation values, while also increasing the chances of wildlife mortality.

Pg. 3-492 "Physical features of the highway, especially steep embankments or retaining walls, may function as barriers to movement for moose, resulting in less use of their current range."

Pg. 3-497 "The 10-mile segment of roadway built on a new alignment would add an infrastructure barrier to wildlife movement that does not exist between about MP 50 and MP 53 on the north side of the Kenai River.... 4.4 miles of the Juneau Creek Alternative....would include a parallel, double roadway barrier to north-south moose movement with the old highway."

Pg. 3-498 The FEIS states that the JCA would likely cause moose habitat to become fragmented along the length of the new alignment, and that habitat fragmentation and avoidance of habitat improvement areas could add to the nutritional stress on moose during winter.

FWS Comment: These represent additional reasons why 2 overpasses are needed, and suggest putting them both on the JCA. If DOT&PF/FHWA will not allow a 2nd overpass, then all underpasses for large mammals should be required to meet the 18-ft full vertical clearance specifications as well as additional underpasses constructed.

RESPONSE: At your request, an additional wildlife underpass has been added east of Juneau Creek at Bean Creek. The exact structure height and type will be refined during final design. DOT&PF will strive for

18 feet of clearance where feasible. Based on the current level of topographic information available, it appears that achieving 18 feet of clearance will be possible at this location.

Pg. 3-508 "Construction activities adjacent to any known nests would occur, to the greatest extent practicable, only during Mid-September through February, when eagles would not be nesting."

FWS Comment: It is unclear how this conservation measure could be implemented due to the typical seasonal constraints associated with highway construction in Alaska, and specifically on the Kenai Peninsula. Please clarify whether construction will be occurring in the winter months as indicated. If not, please adjust the timeframe accordingly.

RESPONSE: Should particular winter construction activities be feasible, DOT&PF would engage in opportunities that avoid sensitive time periods. The statement quoted was identified as a general measure that would be modified to specifically address details of the selected alternative through coordination with USFWS. Should a nest be identified, DOT&PF would contact USFWS to determine appropriate timeframes for each type of activity.

WILDLIFE MITIGATION

Pg. 4-59 "Within the area that would be incorporated into the new highway right-of-way south to the highway, cover for brown bears and other wildlife would be reduced and habitat permanently lost. Wildlife movement would be inhibited because there would be two roads to cross, the existing and the new highways, and animal mortality from vehicle collisions could increase."

"Besides the wildlife impacts in the immediate area of the new highway right-of-way, there are other impacts to KNWR wildlife that cross back and forth between KNWR and CNF, particularly to bears traveling between salmon fishing areas in the project area (lower Juneau Creek on CNF lands, and the Kenai River-Russian River confluence area on CNF and KNWR lands) and tributaries of the Chickaloon River such as Thurman Creek (KNWR, well to the north of the project area). The long segment built on a new alignment under this alternative would fragment bear habitat and has potential to create a substantial barrier to bear movement....The same is true of moose movement through the topographic bench areas on either side of Juneau Creek..."

Pg. 4-60 "The Juneau Creek Bridge located in CNF would include abutments set about 200 feet from the edges of Juneau Creek Canyon. The space along the rim of the canyon under the bridge is important wildlife movement habitat, and the bridge would be designed to allow for ample clearance for wildlife movement from the bear concentration areas downstream to other habitat outside the project area and in KNWR. The width beneath the bridge would be enough to allow for wildlife and for the trails that would be routed near the bridge abutments."

FWS Comment: Pedestrian crossings in important wildlife corridors are not recommended for the reasons outlined above, and if present, substantially reduce the value of this undercrossing as mitigation.

RESPONSE: DOT&PF and FHWA agree, and have disclosed the issue in the Final EIS. Great effort has gone into providing separate locations for pedestrians and wildlife to safely cross the highway. Again, based on your concern, DOT&PF and FHWA have added a wildlife underpass crossing east of the bridge along Bean Creek to improve wildlife passage opportunities without creating conflicts with recreational trails.

Pg. 4-60 "Two crossings of the highway at Forest Service roads west of the canyon, while not meant as wildlife crossings, may serve as a supplemental means for bears to avoid highway traffic and still cross the Juneau Creek Alternative when passing between KNWR habitats and CNF habitats, in addition to dedicated wildlife crossings."

FWS Comment: Again, while wildlife may periodically use these roads, to suggest that these FS roads would be a means for wildlife movement, which implies that these could be considered wildlife crossing areas, is not appropriate.

RESPONSE: The text in the Final EIS is phrased to acknowledge that wildlife may periodically use these roads to cross under the highway. DOT&PF and FHWA have long concurred that these crossings are not designated wildlife crossings and are not meant to be considered mitigation.

Based on a March 7, 2018 email from Kelly Summers, DOT&PF has raised a concern about some of the wildlife overpass structures and associated restrictions on oversize loads on the Sterling Highway, if there is not an alternate route around the structure....Based on this concern, the EIS will now only retain one wildlife overpass for the JCA.

FWS Comment: Wildlife overpasses of this nature have been constructed in other places around the world, where oversized loads are routine. Based on discussions with others, familiar with constructing wildlife overpasses in other part of the country and in Canada, we understand all overpasses now have the standard 5.4 m clearance to allow trucks, even oversize, to pass through. This is an engineering issue, not a wildlife issue, and in other areas, designing an overpass so that the required vehicles (even oversize) can pass through them, does not seem to be an issue.

How large would the overpass structure need to be to pass these 'oversize' vehicles? If they are the standard oversize that requires a 5.4m clearance, there does not appear to be a problem designing them that way. For example, all overpasses in Banff (n=7) are like designed to these specification, as well as those wildlife overpasses in Arizona, and we understand that none have the exit/on ramp option to avoid passing through the overpass.

We therefore believe the reasoning for abandoning the 2nd wildlife overpass previously proposed for the JC Alternative, should be re-examined. Have options such as barge transport been considered for something that is "out of the norm" and excessively large? The wildlife overpasses should be designed to pass the vast majority, if not all, oversize loads but if there is an outlier options for other modes of transport are available. We therefore recommend that the overpasses be designed to accommodate oversize loads and if the old highway is completely unacceptable, DOT&PF/FHWA should examine placing a 2nd overpass elsewhere, if the location makes sense.

For a project of this size, with such substantial direct, indirect, and cumulative impacts anticipated, removal of a 2nd wildlife overpass is insupportable.

RESPONSE: Most locations in the Lower 48 are not restricted to one road only, so alternative routing options are usually available for oversize loads. In this location, the Sterling Highway provides the sole means of surface access—there is no other option. At this time, DOT&PF does not intend to provide a wildlife overpass that would result in a tunnel for vehicles where there is only one road.

Also, DOT&PF has inaccurately assumed that a 1:1 replacement of an overpass for an underpass is adequate. As with any mitigation compensation ratios and due to the substantial benefits that would be

lost if now only constructing one overpass, the replacement ratio should be 3:1 or 4:1 underpasses for 1 overpass.

RESPONSE: DOT&PF did not recommend changing the structure type from an overpass to an underpass based on “compensation ratios.” DOT&PF and FHWA have a responsibility to make sure the NHS remains usable for the traveling public. The proposal to shift to an underpass, with a wider opening, was made in good faith. Based on the mitigation study results, it appears to be in as good or better a location as the previously proposed overpass. Based on your comments, however, an additional wildlife underpass has been added east of the Juneau Creek Bridge at Bean Creek.

Although just outside the project area, as previously requested, consider a wildlife crossing structure in the Quartz Creek area, as wildlife crossing the highway in this location are not only trying to reach the salmon-bearing waters of Quartz Creek, but may be en-route to Crescent Lake or the north shore of Kenai Lake (Attached are 3 possible crossing areas).

RESPONSE: The area proposed is a mile or more east of the current project area. It may be possible to consider that location in the future, if and when that section of highway is upgraded.

The Final Wildlife Mitigation Plan should consider locations which minimize fencing, e.g. in areas where animal movements are constrained due to topography; where the road is narrow (2 lanes as opposed to 3 or 4 lanes); and where adjacent land ownership and development status are considered, to ensure that a larger greenway connects the federal estate on either side of the highway.

RESPONSE: DOT&PF and FHWA have agreed that fencing, vegetation, passing lane tapers, and other design and landscape modifications will be explored with wildlife agency biologists during final design to maximize the efficacy of the crossings.

The key to success is ultimately to direct wildlife safely from federal lands on the north side of the Kenai River to federal lands on the south side of the River, ensuring maximum protection and permeability for wildlife resources. Our remaining habitat cores and corridors are critical to fish and wildlife as they attempt to respond to both natural and man-made changes, and as such, this project should commit to securing non-development, wildlife corridor easements through developable lands. These should be acquired within Unit 395, and elsewhere, e.g. Juneau Creek/Cooper Creek connection, east end of project area and/or just outside of the project area (for example, the proposed MP 43 overpass). These non-development conservation easements should also ensure adequate ingress/egress to and from all animal movement structures to ensure their viability and effectiveness into the future.

RESPONSE: DOT&PF considered the concept of retaining some land in state ownership at State Management Unit 395. However, the parcel was conditionally conveyed to the Borough in 2014 with a 100-foot scenic buffer reserved along each side of any alternative alignment that might be approved. The Alaska Department of Natural Resources (DNR) does not intend to retain any other management authority within the parcel, once conveyed.

We also recommend ensuring that all of the stream culverts on the project are as large as possible to accommodate both passage of wildlife and forecasted increases in stream flows due to a changing climate.

RESPONSE: Culverts will be sized to current hydrological standards for passage of peak flows. Some of these culverts located at drainages may be oversized further to provide for smaller animals to pass

through, and/or some dry culverts may be placed. These will be determined during design, in consultation with wildlife agencies.

INVASIVE SPECIES MANAGEMENT/MONITORING

FWS Comment: Similar to what is being done on the adjacent MP 58-79 Improvements Project, a management and monitoring program should be implemented, especially in light of the fact that a highway will be placed on currently undisturbed, pristine lands. This Plan should be reviewed and approved by the resource agencies and then set up with a reputable contractor for a minimum of 5 years to minimize chances of invasive plants becoming established.

RESPONSE: As stated in Section 3.20.2.3 of the Final EIS, DOT&PF will negotiate an agreement during final design to provide funding to the USFWS and/or Forest Service for post-construction monitoring and control of invasive species.

VISUAL IMPACTS

Pg. 4-60 "Construction of the Juneau Creek Alternative would result in a new cleared swath of land through forest, mostly on CNF land. This swath would appear as an engineered line in a largely natural landscape, and it likely would be visible from portions of the Andrew Simons Wilderness south of the Kenai River....The new highway would be an additional and permanent engineered element to the view, and it would detract from the sense of wilderness and isolation in this designated Wilderness area. However, because other development already exists in the view, the character of the view would change incrementally but would not be a dramatic change."

FWS Comment: As we've stated before, with the extensive vegetation clearing that is to occur in conjunction with the JCA, the resulting changes in the existing natural and rural landscape to one with a strong industrial component (linear man-made element in an undeveloped area) as seen from public viewpoints, should be identified as a significant adverse impact. This will in fact represent a dramatic change, and should be noted accordingly.

RESPONSE: DOT&PF and FHWA have considered this and your previous comments on this matter and continue to respectfully disagree. As a change from the existing condition, DOT&PF and FHWA believe the visual impacts to adjacent Wilderness would be present but of similar character to those to the adjacent Wilderness today. Views of the Sterling Highway and other development, such as Sportsman’s Landing and the linear electric transmission line, have existed since Congress established Wilderness adjacent to the existing Sterling Highway. We disclosed your agency’s views on this issue in footnote 20 on page 4-125 of the Final EIS.

RISKS TO KENAI RIVER

FWS Comment: Map 2.6-4 identifies grades ranging from 4.1% to 6%, but it is unclear how much of the 10-mile JCA will be at a grade that is challenging for heavy truck traffic in the winter, when icy conditions prevail. However, on Pg. 4-154 it states that, compared to the G-South and Cooper Creek alternatives, more of the JCA alignment would have grades above 5%. With the State of Alaska's current fiscal dilemma, there is a very real concern that, during the winter months, the new highway will not always be safe to drive on and/or those carrying hazardous materials and other heavy loads will choose to use the old highway segment instead, as a more reliable route.

RESPONSE: The grades on the proposed alignment are within the standards allowed on a rural principal arterial and will be safe. The DOT&PF M&O division prioritizes NHS segments for their snow plowing operations. The new alignment would be cleared in advance of the “old” Sterling Highway, and typically would be considered the more reliable route. While nothing is currently proposed that would legally prevent trucks from using the "old highway," it is anticipated that the wider lane width, shoulders, clear zone, easier curves, passing lanes, higher speed limit, and ability to maintain consistent speeds will cause most truck traffic not destined for Cooper Landing to use the main highway under all build alternatives. The EIS recognizes that during some winter conditions, commercial operators may choose to use the old highway. In such cases, the risk of spills is no greater than would be experienced under the no build condition. However, under most operating conditions, trucks are expected to use the Juneau Creek Alternative.

Pg. 2-39 "The Juneau Creek alternatives would remove 70 percent of the traffic from these segments of the "old" highway adjacent to the river, reducing the risk of spills into the river, and benefitting the river as a natural water course and as salmon and wildlife habitat."

FWS Comment: The FEIS appears to play down the risks while overemphasizing the benefits of the "preferred" alternative. The Juneau Creek alternative exposes an extensive amount of pristine landscape to substantial, adverse impacts while only marginally lessening the risk to the Kenai River.

RESPONSE: The commenter is quoting from Chapter 2 of the EIS, which is a description of the alternatives and a summary of the analysis that led to identification of the Juneau Creek Alternative as the preferred alternative. The risks of the various alternatives with respect to the river are not downplayed. Section 3.17 of the EIS fully discloses the potential impacts of the build alternatives and No Build Alternative relative to the risk to the Kenai River.

Throughout the FEIS reference is made that the existing highway segment, where not rebuilt, would be expected to carry only 30 percent of traffic in the project area, thereby removing 70 percent of traffic from along the Kenai River. These percentages are questionable and until post-construction traffic counts can be made, basing the extent of potential impacts to wildlife and the reduced risk of potential spills into the Kenai River is not appropriate.

RESPONSE: The reduced risk of the Juneau Creek Alternative is not solely based on the anticipated change in traffic patterns. Risks to the river are documented in Section 3.17 of the EIS. For the Final EIS, a new crash analysis was undertaken and added to Appendix A (*Crash Analysis*). That analysis predicts a 69.7 percent reduction in crashes if the Juneau Creek Alternative is built, compared to the No Build Alternative. Truck crashes were also estimated for the design year (2043) with 2.8 crashes predicted for the No Build Alternative and 1.1 estimated for the Juneau Creek Alternative. Other data were also added to the Final EIS to disclose the potential spill risk to the Kenai River. Section 3.17 documents spill risk and discloses the time it would take for spills to reach the Kenai River. Because the Juneau Creek Alternative has more alignment located farther from the river, spills that would occur would take longer to reach the Kenai River (See Map 3.17-2 in the EIS).

The percentages of traffic forecast for the “old” highway are not “questionable.” The split that is used is appropriate. It was developed based on a sound methodology and represents a legitimate estimate of future traffic. As explained in a response above, the traffic split is based on a study of actual traffic in the project area to confirm when vehicles entered and departed the project area. Approximately 30 percent of traffic was determined to be traffic that stayed in the project area, presumably accessing local destinations, and approximately 70 percent was through traffic that passed quickly through with little or no

stopping.

Further, it is our understanding that many residents and commercial drivers alike believe it is reasonable to assume that those transporting hazardous materials and/or other large commercial truck traffic will continue to utilize the old highway segment, as opposed to the "preferred" route during winter months, to avoid icy conditions on much steeper grades. Inferring that 70% of the traffic, coming down to the Peninsula, would use the JCA is likely over-stated. A caveat should be included in the FEIS to address the likely potential for hazardous material transports and other large, commercial rigs to utilize the old highway during the winter to avoid the steeper, icy grades. This then, needs to be put into context in terms of adjusting the percentages of traffic using the old -vs- the new highway segment and the remaining potential risk of spills to the Kenai River. As recommended in previous comments, other mitigative measures will be needed to reduce risks of accidental releases of hazardous materials into the Kenai River along the existing Sterling Highway. These mitigative measures should be identified and discussed in the FEIS.

RESPONSE: The EIS recognizes that during some winter conditions, commercial operators may choose to use the “old” highway. In such cases, the risk of spills is no greater than would be experienced under the no build condition. However, under most operating conditions, trucks will use the Juneau Creek Alternative. We believe the context has been explained and that remaining risks to the Kenai River are described sufficiently. The purpose of the project is not to eliminate the risk of spills in the Kenai River, but to reduce congestion, bring the highway up to current standards, and improve safety. Compared to the other build alternatives, the Juneau Creek Alternative performs the best on measurable purpose and need criteria. The data bear out that the Juneau Creek alignment will substantially reduce the risk of crashes, including truck crashes; has considerably less of its alignment in proximity to the Kenai River and other Tier 1 streams (reducing the potential that should a spill occur it would reach the steam or river system); and allows more time to respond, compared to other alternatives, should a spill reach a stream.

NOISE

Pg. 3-481 " ... at the time of final pavement design, DOT&PF will consider traffic noise abatement through the use of rubberized asphalt throughout, if the testing that has been ongoing in recent years shows it is durable and if DOT&PF approves it for use."

Pg. 3-492 "All of the build alternatives would increase the amount of moose habitat affected by traffic noise at different magnitudes. When exposed to chronic noise, moose will expand their home range size in directions away from the disturbance."

Pg. 3-503 " ... noise and human activity associated with these northernmost alternatives have the potential to impact important sheep winter range and/or lambing areas. It is possible that the increased highway noise and human activity in the Juneau Creek canyon area would interrupt some sheep and goat movement east-west between mountains."

FWS Comment: In many places throughout the FEIS, noise is identified as an adverse impact to many of the wildlife species in the area. The FHWA noise regulations give each State Highway Administration, flexibility in determining the reasonableness and feasibility of noise abatement. However, because typical noise abatement measures are not being proposed for this project, at a minimum, we recommend the use of rubberized asphalt on the JCA as a "pilot" project that can then help guide the research and fill in data gaps, while also hopefully aiding in reducing potential disturbance-related impacts to bear, moose, Dall sheep and other valuable wildlife species in the region. In addition, appropriate signage should be placed

by the appropriate entity (DOT&PF or KPB) on the new segment, prohibiting the use of jake- brakes.

RESPONSE: While FHWA does not allow the use of quiet pavement as a specific noise abatement measure, the agency allows states to research and construct these pavements when appropriate. The State of Alaska has been testing a rubberized asphalt for its potential to resist wear from studded tires. Such pavement may provide a small tire noise reduction benefit in the 2 to 4 decibel (dB) range. The technique for applying it in Alaska, however, has not been perfected and therefore it is not used in Alaska. The Final EIS text indicates DOT&PF will consider using rubberized asphalt if the current moratorium on its use is lifted by the time this project is under construction.

DOT&PF does not have the authority to prohibit air brakes (also called 'jake' brakes); however, the local government (in this case, the Borough) has the ability to limit their use. Information related to ‘jake’ brakes, their noise level, and status of their regulation had been previously added to Section 3.15 of the Final EIS.

Further, within KNWR, traffic noise under the JCA would extend farther than under current conditions due to alignment of this alternative through the southeast corner of the Mystery Creek Wilderness Area. Minimizing noise-related disturbance impacts to wildlife and recreational enthusiasts alike is vital to the mission and goals of the KNWR.

RESPONSE: DOT&PF has agreed to consider using rubberized asphalt on this project if the state removes the moratorium on using the product. As proposed, the Juneau Creek Alternative will not be aligned through the corner of the Mystery Creek Wilderness due to the anticipated exchange of lands between the U.S. Department of the Interior (USFWS) and CIRI, as discussed in the Final EIS. Nonetheless, the EIS acknowledges changes in location of the highway noise source and the potential noise impacts to wildlife and visitors.

LAND EXCHANGE

On Pg. 3-547, and in other chapters of the FEIS, certain assumptions have been made with respect to targeted lands to be exchanged and acquisition of specific acreage amounts associated with construction of the JCA. For example, it is assumed, based on the Russian River Land Act agreement, that the land exchange would involve about 60 acres of land currently owned by CIRI near the mouth of the Killey River.

Pg. 3-565 "Land ownership also would change near the mouth of the Killey River, where some CIRI land would become part of the KNWR. Development of the CIRI land transferred to KNWR is unlikely to occur under USFWS management."

Pg. 3-566 "Selection of the Juneau Creek Alternative would induce the land exchange between CIRI and USFWS to occur, which would remove up to about 60 acres of KNWR and Wilderness lands in the project area and establish KNWR lands (potentially with Wilderness status) near the mouth of the Killey River. The potential for development on the CIRI land transferred to KNWR would be effectively eliminated."

FWS Comment: We appreciate the note in the document stating that any lands to be included in a land exchange, and the actual area and acreage of those lands, would be determined through negotiations between the USFWS and CIRI. All reference to acreages other than the location and acreage needed for highway construction should be removed from the FEIS. The land exchange and lands to be identified for such would occur under the auspices of the original Settlement Agreement.

RESPONSE: DOT&PF and FHWA believe that sufficient caveats and explanation have been included in the Final EIS to indicate that referenced acreages were for the EIS analysis only. Actual area and acreages of those lands would be determined through negotiations between the USFWS and CIRI under the guidance provided in the original Russian River Land Act Settlement Agreement. The land exchange discussion is clarified in Section V of the ROD.

UNIT 395

On Pg. 3.550, the FEIS states that provision of access for Unit 395 residential development is expected to occur from the existing highway, yet on Pg. 3-551 it references access to Unit 395 from the Sterling Highway is undetermined, and that the Borough could request access across CNF lands from the existing highway or request access directly off the new highway, or both.

FWS Comment: The initial inference is that access will be from the existing highway, yet on the following page, access from the new highway is now a viable option. Additional clarification should be made to minimize misinterpretation in terms of access and where that access will be from.

RESPONSE: While text edits to page 3-550 of the EIS would reduce potential confusion, the detailed discussion presented on page 3-551 provides sufficient context and understanding that the Forest Service requested an evaluation of access off the proposed Juneau Creek Alternative to allow them the ability to evaluate which access would provide the least impact to National Forest lands. Access control is also discussed for each alternative in Section 2.6 of the EIS, specifically 2.6.5.2 for the Juneau Creek Alternative. Further clarification was also made in responses to your comments above.

IMPACTS TO 4(F) RESOURCES ON THE KNWR

Pg. 4-59 "An extension of the "old" Sterling Highway (south of the current highway alignment) would still be necessary to provide access to recreation sites and to Cooper Landing from the west side of the project area. The area south of the highway would use 14.3 acres of KNWR and would be subject to Section 4(f)."

Pg. 4-82 "The only use of KNWR would be for the short connecting road south of the highway."

FWS Comment: The Sterling Highway deviation south of the current highway alignment, just east of MP 56, will have far-reaching, future impacts in addition to those already identified, similar to what we have experienced on the outside bend of the River at MP 57. The extension of the old highway to the south should be re-evaluated and possibly relocated to address likely, future, deleterious effects to Refuge resources. Ongoing discussions on alternatives may necessitate the need to revise these sections of the FEIS dealing with 4(f) use on the KNWR.

RESPONSE: Preliminary engineering at a 30 percent level indicates that a connection to the old highway using a portion of KNWR lands south of the highway will be necessary. As committed to in the Final EIS, DOT&PF will re-examine this connection during final design to see if further reduction in the use of KNWR lands may be possible.

Pg. 4-125 to 4-126 "Mitigation measures such as the dedicated wildlife crossings of the highway would reduce impacts to wildlife movement in and out of the KNWR, but increased levels of habitat

fragmentation, habitat loss, and animal mortality from vehicle-animal collisions would remain for the Juneau Creek Alternative at a higher level than exists today-impacts that are unlikely to be fully mitigated."

FWS Comment: The 2nd overpass, as previously recommended for the Juneau Creek alternatives, would substantially reduce these issues the FEIS indicates are unlikely to be fully mitigated. We therefore urge FHWA/DOT&PF to reconsider the 2nd overpass as initially recommended.

RESPONSE: Most locations in the Lower 48 are not restricted to one road only, so alternative routing options are usually available for oversize loads. In this location, the Sterling Highway provides the sole means of surface access--there is no other option. At this time, DOT&PF does not intend to provide a wildlife overpass that would result in a tunnel for vehicles where there is only one road.

Pg. 4-160 "While the Juneau Creek Alternative would have the greatest impact on wildlife in terms of habitat acreage (because of the length of new roadway across important habitat), DOT&PF and FHWA believe that these impacts can be adequately mitigated."

FWS Comment: Regardless of the land ownership involved, e.g. FS as opposed to KNWR, the above-referenced statements are contradictory and should be changed to accurately reflect the adequacy of mitigation in terms of wildlife/wildlife habitat impacts.

RESPONSE: FHWA does not believe the statements are contradictory and stands by them. Given the impacts referenced, FHWA acknowledges that the wildlife impacts would not be reduced to zero. In other words, there will still be impacts after mitigation. However, as indicated in the second statement referenced from page 4-160 of the EIS, DOT&PF and FHWA believe their proposal will adequately mitigate for the impact and that all possible planning to minimize harm has been undertaken. The ROD incorporates all mitigation commitments documented to date.

ID: 1541 **Source:** Comment Form **Date Submitted:** 4/2/2018
Name: Brita Mjos
Organization:

I have 3 main concerns:

1. Environmental impact of cutting a completely new highway through forest, disrupting wildlife habitat and several popular trails.

RESPONSE: Vegetation impacts are discussed in Section 3.20 of the Final EIS. Wildlife impacts are discussed in Section 3.22. Trail impacts are discussed in Chapter 4.

2. The extremely high cost, especially at a time when Alaska's state budget is struggling. A new highway is not a priority when the state continues to cut funding for state troopers, universities, and many other services many Alaskans benefit from.

RESPONSE: The programming of projects, including this one, goes through a rigorous statewide evaluation and ranking process, which is ultimately approved by the DOT&PF Commissioner and FHWA. This project will be funded by approximately 90 percent federal funds and will be phased in over time. A

draft financial plan is included in the Final EIS (Appendix H) that provides additional details on how the project is proposed to be funded.

3. The argument that the reduced speed in the existing route is dangerous or inappropriate for a highway does not convince me a new route is necessary. If people truly followed the reduced speed limit, ad a limits were enforced more, there is just not a need for people to go 60-70 mph all the way.

RESPONSE: The purpose and need chapter does not indicate that reduced speed in the existing route is dangerous. Conflict points such as driveways, intersections, and stop-and-go traffic along the highway create more opportunities for collisions. Congestion caused by platooned vehicles and frustrated drivers can lead to unsafe passing, and the antiquated roadway design contributes directly to the safety problems and also causes nervous drivers to slow, exacerbating congestion.

ID: 1542 **Source:** Mail **Date Submitted:** 3/20/2018
Name: Rachel Goldstein Neuendorf
Organization:

Rachel Goldstein Neuendorf
37243 Appaloosa Lane
Soldotna, AK 99669

March 20, 2018

Mr. Brian Elliott,
Environmental Manager
DOT&PF Central Region
Sterling Highway MP 46-60 Project
PO Box 196900
Anchorage, AK 99519-6900

Mr. Elliott,

I oppose any "new build project," especially the Juneau Creek Alternative, and I am in favor of the "NO BUILD" option. I am in support of making targeted improvements to the existing highway in Cooper Landing as a way to better advance the safety objective, as this is named as a primary justification for the Juneau Creek Alternative. I oppose any new highway construction for the following two reasons: lack of justification or practicality of the project and impact to the environment, notably the wildlife.

Each justification for the Juneau Creek Alternative project lacks coherence and continuity. First, safety is cited as a concern for building a new highway, however, safety is not an issue for mile post 44.5-51.29 which is below the statewide average for acceptable crash rates. Why spend hundreds of millions of dollars to fix a problem that does not exist? The roughly seven miles of highway above the statewide average is almost entirely related to motorists traveling too fast in a busy, curvy section of Cooper Landing. The responsible and economical answer to this problem is to slow motorists down and provide strict enforcement of the speed limit. Additionally, the project should prohibit roadside parking along the highway from mile 57-57.9. I propose anglers park in designated parking lots and walk to the river at designated access points. This would solve the congestion along the highway. There would be expected pedestrian crossing locations, and this would keep people from wandering along a narrow highway

shoulder.

Moreover, according to your Environmental Impact Statement (EIS) Summary, "local conditions" can be considered when it comes to road design for "rural principle arterial" roads. Local considerations appear to be ignored in any justification for this proposal. Local considerations indicate that the topography of Cooper Landing is not consistent with high speed travel. STOP trying to make a superhighway through Cooper Landing. If you want to keep motorists safe, reduce the speed limit!

REPSONSE: Improving safety is one need, interrelated with other needs, to reduce congestion and meet highway standards. The safety problems, together with the congestion and highway geometry problems, are issues that apply throughout the project area. The Fatal and Major Injury accidents are above the statewide average for several recent years (including the 10-year average from 2000 to 2010) as depicted in Figure 1.2-3 of the EIS. As well, Appendix A (*Crash Analysis*) contains additional technical details on crash rates and statistics, including a comparison with similar stretches of highway that have been improved to modern standards and higher speeds. That analysis found that the improved section of the Sterling Highway between MP 37 and 47 has a lower accident rate (CPMVM of 1.15) as compared to the study area (CPMVM of 1.72). For the Final EIS, a new crash analysis was added to Appendix A. That analysis predicts a 69.7 percent reduction in crashes if the Juneau Creek Alternative is built, compared to the No Build Alternative.

Secondly, the justification referenced in the EIS stating that the land is not "wilderness" is not cogent. This justification is only achieved through the land exchange with the Kenai National Wildlife Refuge, which is intellectually dishonest and is a slight of hand to accomplish the goal stating that the road does not extend through a wilderness area. Rather, the Juneau Creek Alternative will impact land currently defined as "wilderness," and such impacts cannot be reversed. The EIS references how the bypass will help to protect the Kenai River. How will building the longest single-span bridge in Alaska across Juneau Creek not impact the Kenai River? This new bridge will be constructed across a Kenai River tributary where impacts at Juneau Creek will surely be compounded once these waters reach the Kenai River.

Additionally, motorists will still be traveling over the existing highway. This will result in two highways that now pose an increased threat to the majestic Kenai River.

RESPONSE: Despite now considering the land exchange to be reasonably foreseeable, DOT&PF and FHWA still disclose the full impacts to Wilderness (See Section 3.2 of the EIS). Furthermore, cumulative impacts on Wilderness are described in Section 3.27 of the Final EIS.

Each of the build alternatives moves the highway away from the river for some portion of its length. Separating traffic from the river would result in greater time and opportunities for spill response measures. Moreover, with any of the build alternatives the highway will be safer, thereby reducing the risk of crashes, and hence, reducing the risk of catastrophic spills (even for stretches that remain near the river). Section 3.17 (Hazardous Waste Sites and Spills) of the EIS documents the reduction of risks of a contaminant spill (e.g., petroleum or chemical) resulting from a vehicular accident. That section also discloses the time it would take for spills to reach the Kenai River. Because it has more of its alignment farther from the river, spills that would occur along the Juneau Creek Alternative alignment take longer for the material to reach the Kenai River (See Map 3.17-2 in the EIS).

Turning to the wildlife impacts, the number of vehicle collisions with wildlife will pile up if more lanes of traffic are added in Cooper Landing. You sight moose-vehicle collisions and habitat degradation as key contributors to a declining moose population; this will only exacerbate the problem. Your EIS references

extremely poor data on moose migrations, so your answer is to spend millions of dollars of tax payer money to place animal crossings that may never be used? What a waste of money and potentially animal life. This project has the potential to decimate the moose population. Additionally, your "frontcountry" experience will only increase human interactions with bears, likely resulting in more bears being killed in defense of life/property situations, which again you site as a problem.

RESPONSE: The EIS does not rely solely on published moose data. To reduce the risks of moose collisions, DOT&PF and FHWA have committed to establishing wildlife crossings with bridges or large culverts to serve as wildlife underpasses. A specific wildlife mitigation study was performed for the EIS, and study data have been incorporated into the analysis of the locations proposed for establishing crossings along the alternatives. The study included a modeling effort and field validation using cameras. The purpose of the study is to place the crossings at locations where moose and other wildlife are most likely to cross. Fencing, or other designed features, to funnel wildlife to the designated crossing areas is anticipated as part of the crossing design.

There are several practical and economical solutions to the Sterling Highway problems in Cooper Landing. To begin, start by slowing motorists down through Cooper Landing. Enforce a speed limit of 25mph. Prohibit parking along the highway except for designated parking lots. Existing parking lots could even be expanded to accommodate the increased parking traffic. This environmental and economic impact would be a tiny fraction of what the new highway would cost. Additionally, incorporate designated pedestrian crossing locations, even put in stoplights if necessary. Force people to access the river at selected locations. Do not be afraid to add slight inconveniences for tourists in exchange for their hefty hauls from the Kenai River. Do not sacrifice the wilderness and wildlife that residents and tourists alike enjoy. I urge you to reconsider building a new highway. Please keep the Kenai Peninsula wild, and instead be a steward for the wildlife! Don't build this road so weekend warriors from Anchorage and tourists can get to the Kenai River 20 minutes faster, which is the real justification for this project. If you cannot slow down through Cooper Landing and enjoy the amazing view, then maybe one should reconsider driving through at all!

RESPONSE: DOT&PF and FHWA re-examined the stated purpose of the project, took an additional look at the suggestions like these in the Final EIS, and have reaffirmed that attempts to find an alternative that uses the existing alignment throughout would not satisfy the project purpose and need and/or would be not feasible based on sound engineering practice. The results are reported in Chapter 2 (specifically Section 2.5.1) of the EIS. In short, issues remain in this area that result in the alternative not meeting the project purpose and need or in engineering feasibility problems. The physical issues of roadway geometry and unstable bluffs, coupled with the traffic engineering issues, mean this alternative is not reasonable. See also the response to Comment Group 56 in Appendix J (*Comments and Responses on the Draft SEIS*) of the Final EIS.

Thoughtfully,

Rachel Goldstein Neuendorf

ID: 1543 **Source:** Mail **Date Submitted:** 4/2/2018
Name: Gary and Colleen Sonneuil
Organization:

QUESTIONS/COMMENTS FOR STERLING HWY MP 45-60 PROJECT

1. It's likely that large truck traffic will continue to use the "old" highway and the risk of potential spills will remain.

How do you intend to reduce this risk from commercial trucks, choosing not to use the new alignment, especially during the winter?

Is there any way to prohibit through truck traffic on the existing highway segment, especially those that carry hazardous materials?

What about reducing the speed limit on the old highway segment?

RESPONSE: While nothing is currently proposed that would legally prevent trucks from using the "old highway," it is anticipated that the wider lane width, shoulders, clear zone, easier curves, passing lanes, higher speed limit, and ability to maintain consistent speeds will cause most truck traffic not destined for Cooper Landing to use the main highway under all build alternatives. The EIS recognizes that during some winter conditions, commercial operators may choose to use the old highway. In such cases, the risk of spills is no greater than would be experienced under the no build condition. However, under most operating conditions, trucks will use the Juneau Creek Alternative, resulting in a substantial reduction in spill risk to the Kenai River.

Because of similar questions expressed during the Draft EIS, DOT&PF conducted additional analysis. For the Final EIS, a new crash analysis was added to Appendix A (*Crash Analysis*). That analysis predicts a 69.7 percent reduction in crashes if the Juneau Creek Alternative is built, compared to the No Build Alternative. Truck crashes were also estimated for the design year (2043) with 2.8 crashes predicted for the No Build Alternative and only 1.1 estimated for the Juneau Creek Alternative in 2043. Other data was also added to the Final EIS to disclose the potential impacts of spill risk into the Kenai River. Section 3.17 documents spill risk and discloses the time it would take for spills to reach the Kenai River. Because it has more of its alignment farther from the river, spills that would occur along the Juneau Creek Alternative alignment would take longer for the material to reach the Kenai River (See Map 3.17-2 in the EIS).

2. In your Executive Summary it clearly states the Juneau Creek Alternative has the greatest use of and fill in area wetlands; substantial impact on wildlife habitat; and impacts to the Resurrection Pass National Recreational Trail", yet Federal Highways has determined this Alternative would have the least overall harm. How can you justify this statement?

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

3. With all of the wetlands and waters impacts from this "Preferred" Alternative, significant mitigation must be part of the equation.

Is there a way to do "in-kind" mitigation somewhere within the project area or at least within the Kenai River watershed?

If not, is the amount of mitigation going to be additive (Will additional mitigation be done to offset the difference since it appears it will be off-site and out-of-kind)?

RESPONSE: The Final EIS includes a draft Clean Water Act 404(b)(1) analysis (Appendix G) that documents the wetland impacts and proposes mitigation. DOT&PF is in the process of conducting wetland permitting with the U.S. Army Corps of Engineers and will further refine wetland mitigation as part of that permitting process. That mitigation will either include fee-in-lieu or permittee responsible mitigation to mitigate for the wetland impacts associated with the project.

Finally, with such a substantial amount of wildlife habitat impacts that are identified, and the fact that this is such a massive project, the proposed mitigation seems terribly insufficient. A lot more needs to be done to address the habitat loss, wildlife-vehicle collisions and potential DLP's from new subdivision development that will be spurred on by this project.

RESPONSE: The Final EIS fully documents and discloses the potential wildlife habitat impacts and proposes mitigation. The proposed mitigation is based on extensive wildlife crossing research, which included modeling to identify likely wildlife use corridors that have been validated with a year's worth of field camera tracking data to identify the locations most conducive to providing effective crossings.

ID: 1544 **Source:** Email **Date Submitted:** 4/10/2018
Name: Ted Spraker
Organization:

RESPONSE: This letter is a duplicate of ID 1429. See ID 1429 for responses.

April 10, 2018
Brian Elliott
DOT&PF Central Region
Environmental Manager
P.O. Box 196900,
Anchorage, AK 99519-6900

Thank you for the opportunity to offer my personal comments on Cooper Landing MP 45-60 Highway relocation project. As a retired wildlife biologist, having worked for the Department of Fish and Game (ADF&G) for 28 years with 24 as Area Biologist for Kenai Peninsula, I have followed this effort since my first meeting on the plan in 1983. This process has but long in the making but I am pleased you have made the best choice for travelers, the community and resident wildlife. The Juneau Creek Alternative is clearly the best route.

In my efforts to follow this process, I read a recent article, "Bypass may bump businesses, boggle bears" in our local Peninsula Clarion on March 31, 2018. In addition to the information provided in the piece, I

was not surprised to read the “sky is following” comments provided by Kenai National Refuge staff. While the refuge staff focused on the alleged negative impacts to wildlife in the Juneau Creek area, they once again fail to mention the potential catastrophic impact to wildlife if hazard materials are spilled into the river. Supporting a build alternative away from the River is without a doubt the most sensible choice.

Having been involved with bear research projects, in several parts of the state including locally, and years of frequent discussion with Alaskan residents recreating in the outdoors, I cannot support their over stated concerns about impacts to bears. It was not surprising to learn that collared bears use this area for travel, however, what was not shared was that bears surely use other travel areas equally as often. This project will not stop travel or limit bear’s movements. Additionally, the Juneau Creek area supports a low number of bears when compared to the Russian River drainage, which encompasses the G-South alternative. When working for the Department, I noted that the bear density was much greater on the Russian River side compared to the Juneau Creek side by comparing moose calf survival. As it has been shown in several studies, predation on moose calves by bears is the primary controlling factor for their survival. The Russian River area revealed the lowest calf to cow ratios on the Peninsula. This information and local experience in the area strongly suggests that most bear travel is along the Russian River, not Juneau Creek.

Any time a development of this magnitude is undertaken the local area will experience change, however, I am not concerned that it will result in a measurable impact to local wildlife, and there are safeguards in place adopted by the ADF&G and the Board of Game. When considering the welfare of local bears, one must understand their ability to adapt, the population’s resilience and the current harvest program that protects bears, especially sows and cubs. We have a brown bear harvest program for the Kenai Peninsula which allows the harvest of up to 60 bears, with a maximum harvest of 12 adult females annually. This process accounts for all forms of bear mortality. The reported harvests for the past couple years has been about 35 brown bears, comprised of an average of 6 adult females, well below the allowable harvest quota.

I also believe the Juneau Creek alternative will have a positive impact for people that want to use the area for recreation, providing greater access to public lands.

Best Regards,
Ted Spraker,
49230 Victoria Ave
Soldotna, AK 99669

Retired F&G Biologist
Chairman of Board of Game

ID: 1545 **Source:** Comment Form **Date Submitted:** 4/2/2018
Name: Nick Vanderhoff
Organization:

Past Mile 55 the bypass rejoins the existing roadbed -- I guess? There are many sections that are very close to the river before the Skilak turn-off. And I hope the new road will be established north off this treacherous section.

RESPONSE: The Juneau Creek Alternative rejoins the existing highway west of MP 55. The new road will have straighter curves, wider lanes, and full shoulders to improve safety.

ID: 1546 **Source:** Email **Date Submitted:** 4/16/2018
Name: Patrick Lavin
Organization: Defenders of Wildlife

Defenders of Wildlife
441 West 5th Avenue, Suite 302 | Anchorage Alaska 99501 | tel 907.276.9453 | fax 907.276.9454
www.defenders.org

Alaska Department of Transportation & Public Facilities
PO Box 112500
3132 Channel Drive
Juneau, Alaska 99811-2500

April 16, 2018

VIA EMAIL

Re: Cooper Landing Bypass Project

Dear Project Planning Team,

Thank you for this opportunity to comment on the Final Environmental Impact Statement (FEIS) for the Cooper Landing Bypass project. Established in 1947, Defenders of Wildlife is a national, science-based non-profit conservation organization with approximately 1.8 million members and supporters nationwide, including over 3,500 in Alaska. Defenders is focused on conserving and restoring native fish and wildlife species and habitat throughout the country, including our National Forest System lands.

General Comments

Defenders reasserts and incorporates by reference our comments submitted on the draft EIS in 2015. We remain of the view that the FEIS must fully consider an alternative that upgrades the safety features of the existing highway within or immediately adjacent to the existing right-of-way to the greatest extent possible. The FEIS should detail what this alternative would look like and pinpoint the degree to which the resulting highway would fall short of legitimate project goals. It appears from the record that many, though not all, desired improvements could occur within or adjacent to the existing right-of-way and that the resulting improved highway could in fact be a reasonable alternative to consider, even if one or more highway sections remained out of compliance with non-binding safety standards referenced in the FEIS.

RESPONSE: The Final EIS describes an alternative that remains essentially on the existing alignment, and documents the evaluation in Section 2.5.1. This 3R Alternative was carefully evaluated. As stated in the Final EIS, the 3R Alternative is not a reasonable alternative because it would not meet the current project purpose and need of reducing congestion, improving highway geometrics to current standards, and adequately improving safety of the NHS in the Cooper Landing area.

Instead of developing this alternative, ADOT briefly discusses a “Kenai Walls” alternative that it asserts it would need to develop if it attempted a project alternative within the existing roadway. That alternative gets its name from the walls that would need to be constructed at a particular segment where the existing highway cannot be easily widened. The alternative is then quickly dismissed because of the great expense and uncertain engineering that accompany construction of the walls that would enable the road widening.

RESPONSE: The Final EIS describes the evaluation of the Kenai River Walls Alternative. FHWA Guidance for implementing NEPA is that an alternative that does not satisfy the purpose and need for the project should not be included in the analysis as a reasonable alternative. This alternative was eliminated from further consideration because of unusual engineering challenges (particularly unstable soils requiring unusually high walls with risk of failure onto the highway and into the Kenai River), impacts to existing highway traffic during construction, high life-cycle costs, potential impacts to the Kenai River and associated natural resources and recreational uses, and impacts to cultural resources and private properties. Additionally, this alternative had a relatively poor Level of Service for traffic in the design year.

We don’t think the option of improving the existing roadway can be completely dismissed due to the impracticality of widening one small segment. ADOT should instead fully develop that alternative and explain its strengths and weaknesses, as the agency has done for the other “build” alternatives in the FEIS. The agency need not necessarily select that alternative, but it should present the alternative in the FEIS for comparison to other alternatives in terms of achieving legitimate project goals.

RESPONSE: DOT&PF and FHWA re-examined the stated purpose of the project, took an additional look at the suggestions like these in the Final EIS, and reaffirmed that attempts to find an alternative that use the existing alignment throughout would not satisfy the project purpose and need and/or would be not feasible based on sound engineering practice. The results are reported in Chapter 2 (specifically Section 2.5.1) of the EIS. In short, issues remain in this area that result in the alternative not meeting the project purpose and need or in engineering feasibility problems. The physical issues of roadway geometry and unstable bluffs, coupled with the traffic engineering issues, mean this alternative is not reasonable. See also the response to Comment Group 56 in Appendix J (*Comments and Responses on the Draft SEIS*) of the Final EIS. FHWA Guidance for implementing NEPA is that an alternative that does not satisfy the purpose and need for the project or is not technically feasible need not be included in the analysis as a reasonable alternative.

Additionally, among the build alternatives evaluated, it does not appear that the Juneau Creek alternative best avoids impacts to properties protected by section 4(f) of the Department of Transportation Act. The section 4(f) analysis indicates a greater number of impacted properties associated with this alternative, especially the Resurrection Pass National Historic Trail. The trail will be bisected by the Juneau Creek alternative and re-routed under a large new bridge, but unaffected by other alternatives. While we are not necessarily advocating for constructing it, the Cooper Creek alternative appears to best minimize impacts to section 4(f) properties among the build options fully evaluated.

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. There are seven factors FHWA must consider in determining the least overall harm (see Section 4.8.1 of the EIS). The number of Section 4(f) properties affected was a part of the consideration but is not specifically listed among the seven factors. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources in relation to these seven factors. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall

harm.

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Last, it appears that the objective of reducing the risk of spills of toxic substances into the Kenai River has become a de facto project goal. The FEIS, however, has not identified this as a project goal and thus has not analyzed the relative merits of alternative means of achieving it. For example, there is no discussion of what those toxic substances are and how and when they are transported on the existing highway. There is no information presented about the comparative risk of a toxic substance finding its way into the Kenai River pursuant to the various alternatives. It could be that one alternative significantly reduces that risk – indeed, that is the assumption made by many of the Juneau Creek alternative proponents. But it could be that the statistical difference among the options is insignificant, or that the risk is best mitigated by factors unrelated to the bypass location. Given the significance of the spill risk issue, ADOT should evaluate a broader suite of actions that could mitigate that risk and compare and contrast the project alternatives with respect to it.

RESPONSE: The risk of spills has not become a "de facto goal." The purpose and need statement has always recognized the importance of protecting the Kenai River corridor as highlighted below:

"The purpose of the project is to bring the highway up to current standards for a rural principal arterial to efficiently and safely serve through-traffic, local community traffic, and traffic bound for recreation destinations in the area, both now and in the future. ***In achieving this transportation purpose, DOT&PF and FHWA recognize the importance of protecting the Kenai River corridor.***" [Emphasis added]

A discussion of toxic substances that are transported on the Sterling Highway is included in Section 3.17 (Section 3.17.1.2, in particular) in the EIS. Information comparing the risk of a toxic substance finding its way into the Kenai River for each of the alternatives is found in Section 3.17.2.2, and for each of the build alternatives in Sections 3.17.2.3 through 3.17.2.5. For the Final EIS, hydrology engineers calculated the anticipated transit time to the Kenai River for potential spills in tributaries of the river. That information is discussed in Section 3.17 and also depicted on Map 3.17-2. Table 3.17-3 also provides a comparative analysis. The EIS recognizes that there are still risks associated with any of the alternatives.

The Final EIS includes analysis that demonstrates (1) the benefits of improving the highway relative to the risk of crashes and (2) the clean-up response time benefit of moving the highway away from the river. First, additional crash modeling was completed, is included in Appendix A (*Crash Analysis*) of the Final EIS, and is summarized in Section 3.6 (Transportation). That analysis identifies substantial safety benefits and reduction of the risk of crashes under any of the build alternatives as compared to the No Build Alternative. Second, additional analysis and information is included in the Final EIS relative to the risk of spills in water. While a spill into a tributary of the Kenai River can cause ecological impact to the tributary, generally the farther from the Kenai River the spill occurs, the longer it would take for the spilled product to reach the river. This would afford more time for spill response. As can be seen in Map 3.17-3, the Juneau Creek Alternative generally affords more time.

Wildlife Crossings

As noted in the FEIS, the DEIS contained no wildlife crossing and mitigation analysis, so Appendix I represents the first opportunity for the public to review and respond to ADOT's plan to minimize vehicle-wildlife collisions and mitigate impacts to wildlife associated with the build alternatives. The FEIS also indicates that the identified crossings are preliminary at this time and could change upon further consideration and evaluation. We are interested in participating in future meetings or processes designed to consider or refine the wildlife crossing and mitigation plan for whichever project alternative is chosen.

RESPONSE: The Draft SEIS did include information on wildlife crossings and mitigation (See the mitigation discussion in Section 3.22). DOT&PF plans to coordinate with the state and federal wildlife agencies and land managers, and some design meetings will likely be scheduled for pubic participants. Be sure to sign up for the project mailing list on the web site to be alerted to future public involvement opportunities.

Overall, the FEIS could benefit from an overview of more recent information about wildlife crossing considerations and possibilities, including any analyses of successful or unsuccessful attempts to provide for effective crossings in other situations or projects. There is a reference to the 2011 FHWA Handbook on the topic (discussed further below), but given the increasing attention being paid to this issue and the developing understanding of habitat fragmentation and wildlife impact mitigation, it seems that a more recent review of available tools and assessment of their potential applicability or efficacy in this context would be warranted.[1]

RESPONSE: DOT&PF and FHWA commissioned a special study related to the planning and location of wildlife crossings. See *Habitat Use and Movement Patterns of Focal Species on the Kenai Peninsula, Alaska, USA,* (L.H. Suring, W.L. Gaines, and J.S. Begley, 2017). This document is located on the project web site (http://sterlinghighway.net) and contains a literature review of relevant and recent discussion of the issues identified in the comment (including habitat fragmentation, impacts, and the potential applicability and efficacy of potential mitigation techniques).

As to the crossings specifically proposed, it seems that there are not as many proposed as one might expect to see based on the FHWA Handbook. The Handbook notes that projects located in relatively unfragmented areas, as in this case, will typically require more constructed wildlife crossings than projects located in already highly-fragmented areas. The Handbook lists eight existing or proposed projects with wildlife crossings and finds an average spacing between crossings of 1.2 miles.[2] That average spacing would create about a dozen crossing locations for the Juneau Creek alternative, but there are currently just four.

RESPONSE: The FHWA *Wildlife Crossing Handbook* provides general guidance. For this project, FHWA commissioned a specific study (designed with the oversight and input of wildlife biologists from the USFWS, Forest Service, and ADF&G). That study is specific to this project area and includes analysis of the terrain, habitat, and development patterns, and was conducted on the species identified by those agencies. The mitigation proposal was tailored to these specific study results to maintain the movement patterns identified in this project area. Based on the specific modeling completed for this project, wildlife crossing structures are not warranted every 1.2 miles. The modeling, camera work, and crash data suggests that Kenai Lake, the community of Cooper Landing, and the steep terrain limit where animal movements occur.

We understand that wildlife crossing structures are expensive, and those under consideration appear to average about $1 million each. But at a project cost approaching $20 million per mile, a dozen wildlife crossing structures would represent less than 5% of the total. We are unpersuaded by an argument that there is enough money for the road but not for the wildlife crossings, and urge ADOT to first develop the best plan possible for wildlife crossings and mitigation, and then address the availability of funding for various project components.

RESPONSE: There are a number of factors that influence the location and design of wildlife mitigation crossings beyond funding limitations. These include factors such as highway design standards,

topography, impacts to other resources such as wetlands and surface waters, and land ownership and access. DOT&PF and FHWA have developed appropriate wildlife mitigation in consultation with state and federal wildlife agencies and based on a wildlife habitat suitability model and associated field validation effort. A fourth wildlife underpass has been added for a total of five major crossing structures for the Juneau Creek Alternative. DOT&PF and FHWA are committed to working with the wildlife agencies to ensure they are placed and designed to be as effective as possible, and will continue to engage state and federal wildlife agencies during final design to seek other opportunities to further avoid or minimize impacts.

We are concerned about corridors that are anticipated to be shared by humans and wildlife. As the FEIS notes, the presence of humans may reduce the effectiveness of those crossings because some wildlife will seek to avoid the humans. Additionally, these shared corridors may increase the chances of negative interactions between humans and wildlife, especially bears and perhaps other species. Specifically funneling humans and bears to the same travel routes may increase the risk of incidents like people feeling endangered by bears or shooting bears in defense of life or property. ADOT should fully evaluate this risk before choosing, for example, to route hiking paths under the proposed Juneau Creek bridge on both sides of the canyon.[3]

RESPONSE: DOT&PF and FHWA are aware of this issue and have agreed that the trail will be routed close to the bridge abutment to retain as much space as possible on the corridor for wildlife passage. Additionally, DOT&PF and FHWA have added a wildlife crossing structure east of the proposed Juneau Creek Bridge to improve opportunities for wildlife passage without conflicts associated with human recreation trails.

Additionally, it appears that wildlife overpasses are generally believed to be more effective for large mammals than underpasses, and ADOT does propose one overpass for this project. In deciding not to recommend a second overpass, however, the FEIS cites concern about the ability of the overpass to accommodate oversized loads – vehicles that are too tall for the tunnel that the overpass would create. The FEIS fails to explain, however, any engineering limitations on the overpass height or any maximum load size that is allowed or could be expected. Given the existence of many tunnels around the country that accommodate a wide variety of traffic including tall loads, it seems like this should not be a barrier to the second overpass.

RESPONSE: The recommended structure types are based on a 30 percent design. The final structure type will be examined and selected during final design. Instead of the wildlife overpass, a wildlife underpass at site #22 in the same area is recommended. This underpass location appears to be equal or better in terms of serving wildlife movements. The Final EIS states a commitment to examining the potential for constructing this underpass with a wider opening than the typical 23 to 32 feet indicated in the wildlife report (potential options include constructing a bridge for the highway with an opening of 32 feet or greater, or constructing two wildlife underpasses in this area if topography allows). The height of the opening will be at least 18 feet.

Most locations in the Lower 48 are not restricted to one road only, so alternative routing options are usually available for oversize loads. In this location, the Sterling Highway provides the sole means of surface access—there is no other option. At this time, DOT&PF does not intend to provide a wildlife overpass that would result in a tunnel for vehicles where there is only one road.

The Handbook also discusses the value of both project-level and broader systems-level planning for wildlife corridors and crossings. Although the FEIS is at the project level, the analysis of wildlife crossing

design and siting might benefit from assessing wildlife movements and needs beyond the project area and considering including crossings outside of MP 45-60. The FEIS does reference a planned crossing in a project adjacent to the western reach of this project as a relevant consideration with regard to one proposed crossing. We suggest that ADOT employ that same thinking to the Sterling Highway corridor, including the segment from Cooper Landing east to the Seward Highway.

RESPONSE: The wildlife modeling done for the project and reported in *Habitat Use And Movement Patterns of Focal Species on the Kenai Peninsula, Alaska, USA* (L.H. Suring, W.L. Gaines, and J.S. Begley, 2017) included the entire Kenai Peninsula. The recommended locations for the crossings considered movement patterns from this wider study area and were coordinated with the adjacent Sterling Highway MP58–79 Project.

In sum, we encourage ADOT to consider wildlife crossing and mitigation structures and technologies more broadly before selecting the final plans for this project. We also encourage ADOT to look beyond the MP 45-60 road segment when considering where the most appropriate crossings, fencing, or other tools or technologies should be sited. We suggest that you revisit whether to steer humans and wildlife into shared corridor areas. Finally, we urge ADOT to consider adding more wildlife crossing opportunities overall, closer to one crossing every mile, or provide data to explain why just a few crossings will suffice for this project.

RESPONSE: DOT&PF used the recent and relevant information conducted for the project in *Habitat Use And Movement Patterns of Focal Species on the Kenai Peninsula, Alaska, USA* (L.H. Suring, W.L. Gaines, and J.S. Begley, 2017) to identify the location of wildlife crossing structures. Because of terrain and development patterns, major crossing structures are not warranted every mile. The final location and structure type of wildlife crossings will be refined during final design. Fencing, vegetation, and other design and landscape modifications will be explored with cooperating agency biologists during final design to maximize the efficacy of the crossings.

Thank you for your consideration of these comments, and please advise regarding how we may best stay engaged with the planning team on the wildlife crossing strategy is refined during the design phase.

Sincerely,

Pat Lavin
Senior Representative
plavin@defenders.org

[1] For example, in some locations radar technology has been inexpensively employed to detect wildlife movement in areas of concern and notify drivers with a flashing light on the roadway. See, e.g., "Roadside Systems Detect Wildlife to Prevent Collisions," Government Technology, August 27, 2013, available at http://www.govtech.com/public-safety/Roadside-Systems-Detect-Wildlife-to-Prevent-Collisions.html (citing projects in Ontario, Colorado and Florida). There are likely numerous other wildlife crossing projects developed since the 2011 Handbook was published that may be useful to consider.

[2] See FHWA Handbook at p.46-47.

[3] The FHWA Handbook at p.52 counsels against this as well, stating that "mixed use (multi-use with humans) wildlife crossings should not be used" in sites with high connectivity potential, which applies to Juneau Creek.

ID: 1547 **Source:** Email **Date Submitted:** 4/16/2018
Name: Alex Kime **Title:** Owner
Organization: Alaska Horsemen Trail Adventures

Dept. of Transportation & Public Facilities
Sterling Highway MP 45-60 Project
sterlinghwy@hdrinc.com

RESPONSE: This letter is nearly the same as others that were received. See ID 1502 and 1522 for responses and attachments.

April 16, 2018

Att: Brian Elliott,
DOT&PF Central Region
Environmental Manager

Dear DOT

I am Alex Kime, my residence is on Quartz Creek road at mile 45 of the Sterling Highway. I am the owner of Alaska Horsemen Trail Adventures at that location.

I am writing with my concern of how wildlife as well as humans will cross the highway near mile 45 of the Sterling Highway. Near this mile post is where the lake comes closest to the highway. There is a small stream that crosses the highway just west of mile 45. That stream area is a common wildlife through- fare to access the base of Mount Langille where there is a wildlife corridor as well as a goat habitat area. The goat frequent Mt. Langille on the north side of Kenai Lake and Mt. Rhodes on the south side. They go back and forth. Brown and black bear depart the Kenai Lake beach near this spot to head towards Mt. Langille also.

DOT has NOT proposed a way for these animals to cross at this very important spot. This area is currently a 45 mile per hour zone. I understand it will be 65 with the new road. A very dangerous situation for the future for animals and autos.

Connecting the Quartz Creek recreation area with the “Coyote Notch” Trail system is important. This trail roams along the base of Mt Langille and is a designated trail system on Kenai Peninsula Borough Land. Personally, my business has been permitted for the last 20 years with the KPB to do commercial horseback rides on that trail. We use that trail to access our permitted route on Chugach National Forest Land as well. Recreation hikers and skiers use this trail system as well. Access to this trail system is near the small stream just west of mile 45 and off of the Old Sterling Highway road and power lines. The speed limit is 45 at this spot.

Cooper Landing walkable community is neglected on this proposal. Please help us connect a walking trail from Quartz Creek road to the future old sterling highway near mile 46. There is a walking trail there now and it will be destroyed with the new highway.

Quartz Creek road is an area of future growth for the Cooper Landing community. NOT connecting this area to the Coyote Notch trail system or with the walkable community of Cooper Landing would be a shame. Future generations will use this trail system and the only access is to dash across the fast moving NEW highway.

DOT has designed a beautiful new highway. To sign off on this highway as proposed, with all the nice new pull offs and wildlife and pedestrian crossings, and leave the mile 45 area, with all the crossing activity unattended, would be a shame. Please engineer a wildlife and pedestrian crossing to connect to the Coyote Notch trail system at this important area as well as connecting the walkable community of Cooper Landing to the Quartz Creek area. Do that and you can sign off on this road with our blessings!

Sincerely,
Alex Kime

Attachments:
Letter submitted to the state at a highway town hall meeting last year.
Photo of a simple underpass crossing that would work great.

ID: 1548 **Source:** Email **Date Submitted:** 4/15/2018
Name: Heather Pearson
Organization: Kenai Float-n-Fish

RESPONSE: This letter is a duplicate of ID 1510.

PO BOX 568
Mile 48.5 Sterling Highway
Cooper Landing, Alaska 99572
hooked@mightykenai.com
www.mightykenai.com
(907) 595-3505

April 15, 2018

Brian Elliott,
Environmental Manager
DOT&PF Central Region
Sterling Highway MP 45-60 Project
PO Box 196900
Anchorage, AK 99519-6900

Dear Mr. Elliott,

I am writing you on behalf of our Cooper Landing business, Kenai River Float-n-Fish, as well as our family, year-round residents of Cooper Landing. I have some comments on the Final Environmental Impact Statement for the Sterling Highway MP 45-60 Project that I would like to share with you. The project as it stands in current design needs some improvements in planning to help mitigate serious flaws that could have a negative impact to both our business and family. These suggestions are intended to

address our concerns regarding safety, ease of use, and impacts to current uses of the highway corridor by our pedestrian community users (visitors, residents, and children). We appreciate your consideration of the following:

- Current design of intersections at the two junctions of the bypass to the current Sterling Hwy is of concern. We foresee safety issues and potential bottlenecks here especially by motorists traveling to the Sportsman's boat launch/Kenai-Russian River ferry. Making a left turn across 55mph traffic, especially while towing a vessel, presents unnecessary danger at this interchange. Also please take into account that during June and July traffic is frequently backed up on the Sterling Hwy. with vehicles trying to get into Sportsman's. This traffic could potentially back up all the way to the bypass.

- The Sterling Hwy. safety path is a very important resource to the pedestrians in our community. As it path is currently used, people can freely walk between the Quartz Creek Rd. neighborhood to the business areas of Cooper Landing. The current design does not provide a safe pedestrian access or crossing for the safety path near Quartz Creek Rd. This is a negative impact to the current and historic use of the highway corridor and also not aligned with the responsibility of the transportation agency to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into transportation systems.

- The mitigation plans for the project are inappropriate. As the community of Cooper Landing will experience the greatest impacts by the project, Cooper Landing should receive the benefits of mitigation. The current proposed mitigation measures are set to occur in a watershed that is a great distance from the project area. Better plans for project mitigation would include upgrades to the existing safety path in Cooper Landing, including in the project design a pedestrian/bicycling path along the bypass road, and connecting these and any other trails bisected/impacted by the project (Bean Creek Trail, Resurrection Pass Trail).

- Speed limit should be reduced on the current Sterling Highway from 45mph to 35mph from MP 45-47, 35mph to 30mph from MP 47-51, and 45/55mph to 35mph from MP 51 all the way to the junction with the bypass road. This would greatly increase the safety for all pedestrians and bicyclists in Cooper Landing, would increase the enjoyment level for all the scenic drivers who could slow down and enjoy the sightseeing, and would also provide increased safety for trucks delivering goods to Cooper Landing businesses.

Thank you for the opportunity to provide comment on the Sterling Highway MP 45-60 project.

Warm regards,
Heather Pearson

CC:
Chugach National Forest Supervisor's Office
Attn: Forest Supervisor Terri Marceron
161 East 1st Ave., Door 8
Anchorage, AK 99501
mailroom_r10_chugach@fs.fed.us

Kenai National Wildlife Refuge
Attn: Refuge Manager Andy Loranger
P.O. Box 2139

1 Ski Hill Rd.
Soldotna, Alaska 99669-2139
kenai@fws.gov

Kenai Peninsula Borough
Attn: Charlie Pierce, Mayor
144 North Binkley St.
Soldotna, AK 99669
cpierce@kpb.us

ID: 1549 **Source:** Email **Date Submitted:** 4/13/2018
Name: David C. Raskin, Ph.D. **Title:** President
Organization: Friends of Alaska National Wildlife Refuges

Friends of Alaska National Wildlife Refuges
National Friends of the Year 2010
www.alaskarefugefriends.org

P.O. Box 2617
Homer, Alaska 99603
akrefugefriends@gmail.com

April 13, 2018

To: Department of Transportation & Public Facilities
PO Box 112500
3132 Channel Drive
Juneau, Alaska 99811-2500
Re: Sterling Highway MP 45-60

The Friends of Alaska National Wildlife Refuges thank you for the opportunity to make the following comment for the proposed Sterling Highway project, Juneau Creek Alternative. We would like to make the following recommendations as this project is finalized.

Wildlife Mitigation –by highway segment

- Segment 8 (Upper Juneau Creek Bridge): This bridge will allow for movement of brown bear, lynx, and wolverine, as well as provide a reroute of both the Resurrection Trail and the Bean Creek Trail. Our concern is that this addresses two separate goals – wildlife mitigation and the rerouting the USFS trails.

As cited in Appendix I Wildlife Crossings Analysis and Recommendations, with these trails under the planned bridge, wildlife would be less likely to utilize this as a crossing. Having hiking trails running along both sides would funnel wildlife into a narrower corridor. Our recommendation is to provide a separate access for recreational purposes for the Bean Creek Trail. This would restrict recreational access to Resurrection Trail to the west side along the rim of the canyon. Since the primary goal to span the canyon is to reduce impacts to wildlife movement along the stream corridor, this would be a more effective wildlife

mitigation measure. Additionally, the current design would actually increase wildlife/human interaction by promoting the sharing of the same space, likely at the expense of wildlife.

We encourage consultation with wildlife resource agencies on the final design to ensure wildlife mitigation is not compromised for trail access.

RESPONSE: DOT&PF and FHWA are aware of this issue and have agreed that the trail will be routed close to the bridge abutment to retain as much space as possible on the corridor for wildlife passage. The abutments for the bridge are set back 200 feet from the edge of the canyon. To minimize the potential for bear-hiker conflicts, the trail will be moved as close to the abutment as practical to maximize the remaining corridor for wildlife. Additionally, DOT&PF and FHWA have added a wildlife crossing structure east of the proposed Juneau Creek Bridge to improve opportunities for wildlife passage without conflicts associated with human recreation trails. DOT&PF and FHWA are committed to working with the wildlife agencies during final design to ensure the greatest usability of the dedicated wildlife crossings.

- Segment 12 (MP 55 to MP 58): Potential mitigation for the Juneau Creek Alternative is greatest along this stretch of highway and needs to be considered carefully. Two potential overpasses (Crossings #21 and #23) and four potential underpasses (crossings#22 and #24 – #26) have previously been identified. However, due to height restrictions and no alternative bypass, the overpasses are not being considered. Of the 4 identified underpasses, 2 are recommended for the final design - #22 and #24.

We are concerned about two items that are highlighted in Appendix I Wildlife Crossings Analysis and Recommendations: 1) this section of road is identified as a “hot spot for multiple species” as well as “high quality wetlands” (pg.21); and 2) the reference to a habitat patch of wooded habitat near MP 57.1 (pg. 23). With this in mind, it is important to critically evaluate the proposed mitigation.

The two recommended mitigation measures proposed to address this segment are underpasses #22 and #24. The EIS suggests that it may be possible to make the width of the undercrossing greater than the standard 23–32 feet or to install two 23-foot-wide crossings in this general area to maximize the effectiveness. Without the adoption of either of the wildlife overpasses, these 2 underpasses are the only wildlife corridors currently in the final design for this section of highway. We recommend the greatest width possible for the underpasses to accommodate movement and vehicle safety. To achieve maximum effectiveness, we encourage greater consultation with wildlife/resource managers for the final design.

RESPONSE: The Final EIS states a commitment to examining the potential for constructing this underpass with a wider opening than the typical 23 to 32 feet indicated in the wildlife report (potential options include constructing a bridge for the highway with an opening of 32 feet or greater, or constructing two oversize culverts in this area if topography allows). The height of the opening will be at least 18 feet. DOT&PF and FHWA are committed to working with the wildlife agencies during final design to provide useable, dedicated wildlife crossings.

Mitigation measure #24 would enlarge the necessary culvert at Fuller Creek to accommodate wildlife crossings. The culvert would be designed for 15 -20 ft. on either side of the creek. This section warrants a closer analysis to ensure this adequately addresses habitat fragmentation by allowing the opportunity for wildlife movement between wetland habitat along the river south of the highway and core habitat to the north of the highway in the Kenai National Wildlife Refuge. Furthermore, for all underpasses, we encourage the engineering to accommodate streambank geomorphology and riparian wetland function to best stimulate a wildlife corridor.

RESPONSE: DOT&PF and FHWA are committed to working with the wildlife agencies during final design. Fencing, vegetation, and other design and landscape modifications will be explored with cooperating agency biologists during final design to maximize the efficacy of the crossings.

A particular concern is the proposed improvement to the existing highway just west to this crossing. Improvements include the addition of an eastbound passing lane near MP 57.5 at Fuller Creek. Without adequate mitigation measures for section 12 of the highway (as noted above), increasing vehicle speeds just before Fuller Creek would exacerbate the problem of wildlife crossing and the associated potential for vehicle collisions. Since AKDOT/FHWA did not incorporate an overpasses near MP 57, we recommend that the passing lane should be removed in the final plans. Additionally, this section of road is a location where fencing, or some other method, be utilized to help funnel wildlife through the designated crossing. Again, we encourage the consultation of resource/wildlife planners to address these issues.

RESPONSE: Section 12 of the highway has proposed crossings at MP 56.3 and at Fuller Creek (MP 57.2). Vehicle speeds are not anticipated to be "increasing just before Fuller Creek." The speed limit through this section will be a uniform 55 mph just at it is today. Again, as mentioned above, DOT&PF and FHWA are committed to working with the wildlife agencies during final design. Fencing, vegetation, and other design and landscape modifications will be explored with cooperating agency biologists during final design to maximize the efficacy of the crossings.

Wetland Mitigation

As noted in the EIS, the "Juneau Creek alternatives would result in more than 3 times the total area of wetland loss of the Cooper Creek Alternative, including 6 times as much loss of emergent wetlands and nearly 12 times as much loss of forested wetlands. The G South Alternative would have intermediate wetland impacts." With the decision to move forward with the Juneau Creek Alternative, the AKDOT/FHWA has the responsibility for substantial wetland mitigation. To minimize wetland impacts, BMP during construction will be employed. We encourage the adoption of practices for the preservation of buffer zones and riparian areas to the fullest extent possible to lessen the cumulative effects of wetlands impacts.

To compensate for impacts that are deemed unavoidable, the AKDOT will pay an in-lieu fee to a land conservation organization for "protection or enhancement of wetlands in a critical location on the Kenai Peninsula." As established in the EPA 2008 Mitigation Final Rule, compensatory mitigation must restore or enhance similar wetlands within the same watershed. We would like to reinforce this approach and specify that any fees directed toward preservation/enhancement occur within the same watersheds. In the event that this is not possible, any projects adopted as off-site mitigation should be focused on the Kenai Peninsula and provide preservation or restoration of similar wetland function. We recommend that the ratio of preservation be set at a minimum of 2:1.

Furthermore, in-lieu fees are not currently a workable compensatory strategy, as there is not a conservation organization with an established agreement with the USACOE that includes the South Central Service Area. Permittee-Responsible mitigation will likely be the tool employed, thus AKDOT will need to identify a third party that has the capacity to implement any restoration, enhancement, or preservation efforts. We recommend that in-lieu fees be utilized by a conservation organization with an established record for restoration on the Kenai Peninsula to ensure that local priorities are identified and addressed. We believe this is achievable, as there are several organizations that can work together to both identify and conduct wetland, stream, or other aquatic resource restoration, creation, enhancement,

or preservation activities.

RESPONSE: The Juneau Creek Alternative would include more fill in wetlands but would move traffic away from the Kenai River over the longest distance. Both the wetlands and the river are considered "waters of the United States" under jurisdiction of the Clean Water Act. FHWA's determination is that moving the highway farther away from the Kenai River by selecting the Juneau Creek Alternative will result in less overall harm and be less environmentally damaging, despite the higher amount of fill in wetlands. Additionally, the Final EIS includes a draft Clean Water Act 404(b)(1) analysis (Appendix G) that documents the wetland impacts and proposes mitigation. DOT&PF is in the process of conducting wetland permitting with the U.S. Army Corps of Engineers and will further refine wetland mitigation as part of that permitting process. That mitigation will either include fee-in-lieu or permittee responsible mitigation to mitigate for the wetland impacts associated with the project.

Construction BMP/Revegetation Plans:

We recommend consultation with the Kenai Peninsula Cooperative Weed Management Area (KP-CWMA) technical advisory board for BMP on all construction sites to minimize inadvertent introduction of non-native or invasive plant species. Much of the area impacted is in native vegetation. so all disturbed sites will be particularly susceptible to invasive weed introduction by equipment and materials. We expect that any contractors/subcontractors responsible for development of on-site revegetation plans be required to consult with the KP-CWMA for a recommended seed mix.

RESPONSE: DOT&PF is addressing the Alaska Highway System as a vector for the spread of invasive plants via the M&O BMPs being implemented, construction BMPs being implemented during project work, the use of weed-free products, coordination with local weeds groups, and the DOT&PF Integrated Vegetation Management Plan (IVMP). Thank you for the suggestion to coordinate with Kenai Peninsula Cooperative Weed Management Area (KP- CWMA) technical advisory board.

Thank you for this opportunity to comment.

David C. Raskin, Ph.D.
President
Friends of Alaska National Wildlife Refuges

ID: 1550 **Source:** Email **Date Submitted:** 4/12/2018
Name: Janette Cadieux **Title:** Chair
Organization: Cooper Landing Advisory Planning Commission

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Dear Mr. Elliott:

I am attaching a letter with comments from the Cooper Landing Advisory Planning Commission (CLAPC) on behalf of the Cooper Landing community regarding the Sterling Highway Milepost 45-60 Final Environmental Impact Statement. You will see that I am copying Andy Loranger, Refuge Manager of Kenai Natl. Wildlife Refuge, Terri Marceron, Forest Supervisor of Chugach Natl. Forest, Charlie Pierce,

Mayor of Kenai Peninsula Borough, and Bruce Wall, Planner, of Kenai Peninsula Borough.

The CLAPC is prepared to meet and discuss community needs and concerns if you have questions that require follow-up. As Chair, please feel free to contact me directly. Because the proposed Bypass will strongly impact the community of Cooper Landing, we welcome the opportunity to work with DOT&PF and other agency representatives to determine how this project can address those impacts upon our community and lands.

Respectfully,

Janette Cadieux
CLAPC, Chair

Attached text follows:

Cooper Landing Advisory Planning Commission
P.O. Box694
Cooper Landing, AK 99572

April 12, 2018

Brian Elliott,
Environmental Manager
DOT&PF Central Region
Sterling Highway MP 45-60 Project
P.O. Box 196900
Anchorage, AK 99519-6900

Dear Mr. Elliott:

I am writing to you on behalf of the Cooper Landing Advisory Planning Commission and thereby the community of Cooper Landing. We wish to express our thoughts In response to the Final Environmental Impact Statement for the Sterling Highway MP 45-60 Project. To be succinct and dear, I will provide you with bulleted points.

- Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the Kenai River that exist today. These issues must be addressed regardless of Bypass construction.
- There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.
- The Juneau Creek parking area by the proposed Bypass must not allow overnight camping but should allow for overnight parking, as many users will park here for overnight hiking trips.
- Outhouse sites must be provided and maintained at the Juneau Falls pull out.
- The Bypass has spots that overburden from construction will be dumped or materials extracted. Efforts should be made to prevent these areas from becoming defacto camping sites or shooting ranges.
- This project's impacts on our community and its re-creation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper landing

Walkable Community Project's Plan {such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). lncluding these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project. Improving the "walkability" within the existing Sterling Highway corridor will not only enhance safety and access for pedestrians and bicyclists, but will also enhance the economy of the community by attracting visitors who can safely and effectively visit both businesses and the local recreation attractions. This should be the minimum level of mitigation for the extensive recreational and economic imp-acts upon the Cooper Landing community by this project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to Integrate walking and bicycling into their transportation systems. Please see the following web pages for greater information about the Cooper landing Safety Path: http://www.walkcooperlandlng.org/safety-path/ and http://www.walkcooperlanding.org/historical-timeline/.

- It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and recreational facilities accessed there. We feel that failing to provide this crossing would be negligent.
- The two interchange points of the Bypass and existing roadway are concerning because, as they are planned, they rely on T intersections which create left turns across 55 mph traffic and do not provide a complete solution for the intense periods of use such as use during sockeye season and dip netting. The likely outcome of these intersections will be significant periods of congestion as are experienced during peak season at the intersection of the Sterling and Seward highways for north bound traffic. Both ends need better plans for integrating local access and reducing the inevitable congestion. Severe loss of business access may occur during high use periods if drivers are frustrated by difficult transitions on/off the existing roadway. This would be In addition to general local traffic hardships and emergency vehicle access problems.
- It cannot be overstated that there should not be any driveway permits or other methods of road access to the Bypass aside from the two designated parking lots associated with the Juneau Falls trail.
- Highway exit signs should include a suite of information that recognizes and honors Cooper Landings services and economic opportunities including scenic, historic, recreation, goods and services, lodging, camping, fishing, guided activities etc.
- Trees removed throughout the project area should be made available in an organized and safe manner to local firewood users.
- Proposed mitigation measures should be reevaluated to better address user access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
    - Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.
        - Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the

project but does not adequately address the affected trail or community.

- Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek when~ not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide tile directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.
- Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Thank you for the opportunity to express the interests of Cooper landing regarding the Sterling Highway MP 45-60 Project. We are the ones most impacted by this project and hope that you will address the concerns raised by our community. If you have any questions regarding this above list, please feel free to contact us. I will list my individual information below as a starting point.

Respectfully,

Janette Cadieux,
Cooper Landing Advisory Planning Commission Chair
907-595-4686, jette.cadieux@gmail.com

CC:
Chugach National Forest Supervisors Office
Attn: Forest Supervisor Terri Marceron
161 East l St Ave., Door 8
Anchorage, AK 99501
mailroom r10 chugach@fs.fed.us

Kenai Peninsula Borough
Attn: Charlie Pierce, Mayor
144 North Binkley St.
Soldotna, AK 99669
cpierce@kpb.us

Kenai National WIidiife Refuge
Attn: Refuge Manager Andy Loranger
P.O. Box 2139
1 Ski Hill Rd.
Soldotna, Alaska 99669-2139
kenai@fws.gov

ID: 1551 **Source:** Web **Date Submitted:** 4/18/2018
Name: David Nees
Organization:

I have not seen any information in the plan to address the avalanche zones the highway will pass through in mile 46-47.

We have had several avalanches in this area and the most recent several years back swept a suburban with a mother and her school children off the road and down a cliff.

Happily no one was killed.

There is no avalanche control in area due to the sheep.

Europe has avalanche sheds incorporated into their road designs, and the Alaska Railroad used to have them along their route from Seward.

I hope you will look at the avalanche chutes in the road construction project and build sheds.

RESPONSE: The issue of avalanches has been considered in the Final EIS. The road is proposed on the same alignment across the avalanche chute you cite. DOT&PF will examine the avalanche chute and consider if additional design changes are warranted.

David Nees
9075221118

ID: 1554 **Source:** Email **Date Submitted:** 4/14/2018
Name: Dale Lundell
Organization:

I attended the last set of meetings you provided and the Juneau Alternative is the best route. I say, "the sooner the better" and I have a new shovel if want to start now. Thank You for all the work you've done and are planning to do, Godspeed.
Thanks again
Dale C. Lundell

RESPONSE: Comment noted.

ID: 1555 **Source:** Email **Date Submitted:** 4/3/2018
Name: Judith Bittner
Organization: Alaska Office of History and Archaeology

From: Rollins, Mark W (DNR)
Sent: Tuesday, April 03, 2018 9:12 AM

To: Lohrey, John (FHWA)
Cc: Summers, Kelly L (DOT)
Subject: Sterling Highway MP 45-60 Project, Final EIS
Attachments: Scanned from a Xerox multifunction device.pdf

3130-1R FHWA
RevComp ID #2018-00294

Good Morning John,

Attached is our response letter following our review of the Final EIS and a hard copy is in the mail. We have no further comments on the subject project. We appreciate FHWA and DOT&PF working closely with our office throughout the consultation process and look forward to continued consultation under Appendix K, Section 106 Programmatic Agreement.

RESPONSE: Comment noted.

Cheers,
Mark
Mark W. Rollins
Archaeologist II
Alaska State Historic Preservation Office/Office of History and Archaeology
550 West 7th Avenue, Suite 1310
Anchorage, AK 99501
(907) 269-8722

Attached text follows:

THE STATE OF ALASKA
GOVERNOR BILL WALKER
Department of Natural Resources
DIVISION OF PARKS & OUTDOOR RECREATION
Office of History & Archaeology
550 West 7 Ave., Suite 1310
Anchorage, Alaska 99501-3565
Main: 907.269.8721
http://dnr.alaska.gov/parks/oha

File No.: 3130-lR FHWA/2018-00294

Subject: Sterling Highway MP 45-60 Project Final Environmental Impact Statement and Final Section 4(f) Evaluation (EIS)

John Lohrey
Federal Highway Administration
PO Box 21648
Juneau, AK 99802-1648

Dear Mr. Lohrey,

The Alaska State Historic Preservation Office (AK SHPO) received your letter (dated March 6, 2018) on March 8, 2018. Following our review of the Final EIS, we have no further comments.

Thank you for addressing our previous comments (from December 14, 2017) on the Revised Preliminary Final EIS. We appreciate your itemized responses to our comments. Please contact Mark Rollins at 269-8722 or mark.rollins@alaska. gov if you have any questions or if we can be of further assistance.

Sincerely,

Judith E. Bittner
State Historic Preservation Officer
[signed by Jo Antonson, Deputy State Historic Preservation Officer]

JEB:mwr
Cc: Kelly Summers, P.E., Project Manager, DOT&PF, Kelly.summers@alaska. gov

RESPONSE: Comment noted.

ID: 1556 **Source:** Mail **Date Submitted:** 4/16/2018
Name: Brian Blossom
Organization: ADF&G, Division of Habitat

THE STATE OF ALASKA
GOVERNOR BILL WALKER
Department of Fish and Game
DIVISION OF HABITAT
Kenai Peninsula Office
514 Funny River Road
Soldotna. Alaska 99669-8255
Main: 907.714.2475
Fax: 907.260.5992

April 16, 2018

Brian Elliott, Environmental Manager
DOT&PF Central Region
Sterling Highway MP 45-60 Project
P.O. Box 196900
Anchorage, AK 99519-6900

Dear Mr. Elliott:

The Department of Fish and Game (ADF&G), has reviewed the Sterling Highway MP 45-60 Project Final Environmental Impact Statement (EIS) and Final Section 4(f) Evaluation. The Federal Highway Administration and the Alaska Department of Transportation and Public Facilities (ADOT &PF) identified the Juneau Creek Alternative as the preferred alternative. The consolidated comments of the Department

are summarized below.

ADF&G would like to thank the Federal Highway Administration and ADOT&PF for the opportunity to provide comments throughout the draft reviews of the Sterling Highway MP 45-60 EIS and 4(f) Evaluation. ADF&G supports the inclusion of our past comments into the Final EIS and 4(f) Evaluation.

Thank you for the opportunity to provide comments.

Sincerely,

Brian Blossom
Kenai Peninsula Area Manager
ADF&G, Division of Habitat

RESPONSE: Comment noted. No additional “consolidated comments” were received.

ID: 1559 **Source:** Mail **Date Submitted:** 4/15/2018
Name: Garvan Bucaria
Organization:

April 15, 2018

Brian Elliott
Environmental manager
Sterling Highway MP 45-60 Project
DOT & PF Central Region
P.O. Box 196900
Anchorage, AK 99519-6900

Comments: Sterling Highway Milepost 45-60 Project

The Cooper Creek alternative avoids all new impacts to fish and wildlife north of the Kenai River with little effect on Cooper Creek. Cooper Creek no longer provides king salmon spawning since the Cooper Lake project was completed. The Russian River is completely protected under the Cooper Creek alternative and perhaps one third of the Kenai River will be protected from potential petroleum oil spills.

Please note the need to distinguish the difference between the fewest number of salmon tributary streams affected by all north of the Kenai River road building options versus the most productive streams for king salmon spawning. I refer specifically to Juneau Creek. This is a major spawning stream for king salmon in the upper Kenai River system. This should be emphasized in your impacts and benefits section and must be protected from potential petroleum spills and road runoff. Your three alternatives north of the Kenai River will have the most adverse effect on moose winter range specifically and big game generally. Overpasses and underpasses for wildlife will be of little use unless roadways are fenced along the entire route. Such mitigation measures may not be cost effective.

You received Senator Micciche's Senate Concurrent Resolution No. 6 advocating the Juneau Creek Alternative and urging land exchanges. This resolution fails to protect tributary streams north of the Kenai

River and should be excluded.

My comments are based upon working for the Branch of River Basin Studies Fish and Wildlife Service Cooper Lake project in 1961 and subsequent employment as a wildlife biologist with the Chugach National Forest, retiring in 1998.

Please adopt these recommendations and select the Cooper Creek alternative for this highway construction project.

Sincerely,
Garvan Bucaria
P.O. Box 870298
Wasilla, AK 99687

RESPONSE: DOT&PF and FHWA are aware of the impacts you describe and fully disclose them in the Final EIS. FHWA selected the Juneau Creek Alternative because it has the least overall harm of any of the alternatives when comparing all impacts to all resources. Section 4.8 of the Final EIS describes the analysis undertaken to arrive at the decision to select the Juneau Creek Alternative in the ROD as the alternative with the least overall harm.

The Kenai River was determined to have greater significance than other Section 4(f) properties. With the Cooper Creek Alternative being located close to the river over much of its length (56 percent within 500 feet, more than any other alternative), this was considered a substantial shortcoming of the alternative. When DOT&PF and FHWA published the Draft SEIS in 2015, effects to the Kenai River Special Management Area were thought to be *de minimis* impacts. However, the DNR, the agency "official with jurisdiction," did not concur. DNR indicated that impacts to and importance of the river had not been adequately factored into the analysis. ADF&G, as manager of the fish resources, recommended a Juneau Creek alternative be selected for protection of fish.

The Cooper Creek Alternative, besides carrying all traffic close to the Kenai River over most of its length, was the only alternative to substantially impact the community of Cooper Landing. The alignment would have passed through the portion of the community north of the Kenai River and portions south of the river, creating property, noise, and traffic impacts and reducing the level of service on the highway (reducing the effectiveness of satisfying the project's purpose and need). The Juneau Creek Alternative avoids these community impacts.

Evaluation indicates that the Cooper Creek Alternative would satisfy the purpose and need least well of the alternatives. It would retain many intersections and driveways that would be substantially minimized under other alternatives, particularly the Juneau Creek alternatives, and would retain mixing of through and local traffic. The level of service projected for this alternative, based on the "percent time spent following" another vehicle and on opportunities to pass, would be lowest of the alternatives.

ID: 1560 **Source:** Mail **Date Submitted:** 3/28/2018
Name: Jill Nogi
Organization: EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10
OFFICE OF ENVIRONMENTAL REVIEW AND ASSESSMENT
1200 Sixth Avenue
Seattle, WA 98101-3140

March 28, 2018

Mr. John Lohrey
Alaska Department of Transportation
and Public Facilities Central Region
Sterling Highway MP 45-60 Project
PO Box 196900
Anchorage, Alaska 99519-6900

Dear Mr. Lohrey:

Thank you for the opportunity to review the Final Supplemental Environmental Impact Statement for the Sterling Highway Mile Post 45-60 Project in and near Cooper Landing, Alaska (CEQ # 20180039/EPA Project #15-0028-FHW). Our review was conducted pursuant to the National Environmental Policy Act, the Council on Environmental Quality regulations (40 CFR § 1500-1508) and Section 309 of the Clean Air Act.

We note the Final SEIS identifies the Juneau Creek Alternative as the Federal Highway Administration's Preferred Alternative. We understand that this determination was challenging, given the complexity of the project and the variety of resources which needed to be considered. We recognize the Preferred Alternative will require a land exchange between the Kenai National Wildlife Refuge and the CIRI Corporation; have substantial impacts to recreational, visual, aquatic and cultural resources; and may divert traffic from local businesses and establishments. We agree it strikes the appropriate balance between resource protection and impacts. The Preferred Alternative will improve road safety while moving a large percentage of traffic away from the Kenai River, thus avoiding the need for additional river crossings.

We appreciate the extensive consideration of our agency's input, that of other agencies, and input from other interested and affected stakeholders. We also appreciate the inclusion of wildlife crossings as part of the Preferred Alternative's current design.

Thank you again for the opportunity to review the Final SEIS. Should you have any questions regarding our comments, please contact Jennifer Curtis at (907) 271-6324 or by electronic mail at curtis.jennifer@epa.gov, or you may contact me at (206) 553-1841 or nogi.jill@epa.gov.

Sincerely,

Jill A. Nogi, Manager
Environmental Review and Sediment Management Unit

RESPONSE: Comment noted.

ID: 1564 **Source:** Web **Date Submitted:** 4/5/2018
Name: Joey Preston
Organization:

RESPONSE: This letter is nearly the same as others that were received. See responses under ID 1402, 1409, and/or 1412.

Sterling Highway MP 45-60 Project Planners,

My name is Joey Preston and I support a Walkable Cooper Landing because it makes for a closer community.

Residents and visitors of Cooper Landing, AK have made their way through the community along a path parallel to the Sterling Highway for decades. The community has held a trail run annually along the "Safety Path" to promote and celebrate the use this pathway provides the community on a daily basis year round.

The Sterling Highway MP 45-60 Project has the potential to meaningfully improve these users' ability to safely travel this path between public lands and facilities, home, school, work, community activities, or recreational opportunities.

Project planners should reevaluate the following considerations:

This project's impacts on our community and its recreation-based economy greatly outweigh the proposed mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.

Because the Safety Path is entirely on the north side of the Sterling Highway, users of the Safety Path will have to cross or enter the new highway alignment at approximately MP 46. The MP 45-60 Project Design does not appear to address or provide safe crossing at that point or any other for bike/pedestrian traffic and we feel that failing to provide for these uses is negligent and fails to meet transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and to integrate walking and bicycling into their transportation systems.

It is imperative that project planners provide safe crossing near Quartz Creek Road for users of the Cooper Landing Safety Path/Our Point of View road which exists entirely on the north side of the existing highway. The MP 45-60 Project design does not appear to address or provide safe crossing of the existing or proposed Sterling Highway for pedestrians traveling from or to Quartz Creek Road and all of the businesses and facilities accessed there. We feel that failing to provide this crossing would be negligence.

Proposed mitigation measures should be reevaluated to better address user access to the transportation

and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Providing pedestrian walkways on the Snow River bridges on the Seward Highway is not an acceptable mitigation measure for the crossing of Resurrection Pass Trail.

Mitigation applied to the Snow River bridges creates a connection to a different long-distance trail in the National Trails System in a different community than the one affected by the project but does not adequately address the affected trail or community.

Construction of pedestrian walkways crossing the Kenai River east of the Resurrection Pass trailhead where only a narrow shoulder on the road serves as pedestrian access and crossing Cooper Creek where not even an adequate shoulder exists for pedestrian access are two examples of mitigation measures that more effectively provide the directly affected community and users access to the transportation and utility systems in and across the affected Resurrection Pass Trail Conservation System Unit.

Constructing trail segments that connect the affected community of Cooper Landing to the Resurrection Pass Trail and the other surrounding public lands and facilities can be accomplished within the highway right-of-way and is a more appropriate use of mitigation measure opportunities.

Unless use of the Bypass by truck traffic is required and enforced, the existing roadway will continue to experience the safety issues and dangers to the river that exist today. These issues must be addressed regardless of Bypass construction.

There should be lookout sites and viewpoints established or existing ones enhanced along the existing Sterling Hwy. / town loop as a way to promote the character of the National Scenic Byway.

Thank you for taking my comments into consideration and reevaluating the proposed plan to make sure to that accommodating new travel facilities for motorized traffic does not exclude or come at a cost to established and needed pedestrian and non-motorized facilities or transportation agency responsibilities to improve conditions and opportunities for walking and bicycling and their integration into our transportation systems.

Sincerely,

Joey Preston

ID: 1572 **Source:** Email **Date Submitted:** 5/8/2018
Name: Chris Degernes, Sandra Holsten, Ed Holsten, Laura Johnson; Elaina Spraker
Organization: Cooper Landing Walkable Community Project; Office of Senator Dan Sullivan

From: Spraker, Elaina (Sullivan) [mailto:Elaina_Spraker@sullivan.senate.gov]
Sent: Tuesday, May 8, 2018 3:57 PM
To: Lohrey, John (FHWA) <John.Lohrey@dot.gov>; marc.luiken alaska.gov <marc.luiken@alaska.gov>
Subject: FW: Concerns regarding Sterling Hwy MP 45-60 Project

John and Marc, hope you are doing well. I recently spent an afternoon with our Cooper Landing constituents and one of the issues brought up of significant importance was mitigation regarding the

Sterling Highway MP-45-60 project. Although they attended the public meetings, they felt their concerns might not be reflected. They are supportive of the current Juneau Creek Alternative, however, as community members that will be greatly impacted, they would like to be a significant participant in the development of the project. In reviewing their letter, I believe they have good ideas and like the Snug Harbor project will be beneficial in the process ensuring a quality end product. As we move forward, please let me know how I may assist in the continuation of a strong relationship between our agencies and our local communities we serve.

Regards, Elaina

Elaina Spraker
Office of Senator Dan Sullivan
NOTE OUR NEW ADDRESS AND PHONE:
44539 Sterling Highway, Suite 204
Soldotna, AK 99669
(907)262-4040 / Fax: (907)262-4224

To Join Senator Sullivan's Newsletter sign up: http://www.sullivan.senate.gov/contact/newsletter

From: Chris Degernes [mailto:jaeger06@hotmail.com]
Sent: Tuesday, May 08, 2018 12:41 PM
To: Spraker, Elaina (Sullivan) <Elaina_Spraker@sullivan.senate.gov>
Cc: Sandra Holsten <sandrakey8@msn.com>; Chris Degernes <jaeger06@hotmail.com>; Laura Johnson <ljohnsonak@gmail.com>
Subject: Concerns regarding Sterling Hwy MP 45-60 Project

Hi Elaina – thank you so much for taking the time to stop in for a Cooper Landing visit last week. I've attached a letter with some of our concerns articulated – the Sterling Highway 45-60 project is headed in the right direction with the selection of the Juneau Creek Alternative, but the lack of adequate mitigation for impacts to our community is sorely lacking. I hope you can assist in bringing this to the attention of the agencies involved.

Thanks again, Chris Degernes

Sent from Mail for Windows 10

Attachment follows:

May 8, 2018

Ms. Elaina Spraker
Office of Senator Dan Sullivan
44539 Sterling Highway, Suite 204
Soldotna, AK 99669

Dear Elaina:

Thanks for taking the time to meet with a few of us Cooper Landing folks last week! We really appreciate your willingness to meet with local residents, hear our concerns, and pass along our ideas and suggestions to Senator Sullivan.

One of the discussion items last week related to the proposed Sterling Highway MP 45-60 bypass project. Although this project has been discussed for many years, there is a worry among a lot of local Cooper Landing residents that the state and federal agency personnel really don't care much about our opinions. We feel that we are significantly affected by the current congestion and dangerous traffic situation on the

Sterling Highway, and will be greatly affected by any plans for a bypass as well. In particular, we don't feel like the following concerns have been "heard" by the Alaska Department of Transportation nor the Federal Highway administrators involved in this project:

- **Mitigation for impacts to recreation –**
  - The proposed mitigation for impacts to the Resurrection Pass Trail system (a pedestrian bridge over the Snow River) is not adequate for the true impacts this community will experience due to the bypass. This community desires mitigation to the recreational impacts that will occur in our valley, to be in our valley.

RESPONSE: The proposed mitigation is specific to the Resurrection Pass Trail and was proposed and coordinated with the Forest Service as the manager of both trail systems. The mitigation proposed at Snow River is intended to mitigate for the disruption to one long-distance national trail by helping connect a similar long-distance national trail. It is not proposed as mitigation to local community trails.

  - This project's impacts on our community and its recreation-based economy greatly outweigh the proposed (and minimal) mitigation plans. Mitigation planning should be considerably more extensive and should include improving the existing "Safety Path" with the established components of the Cooper Landing Walkable Community Project's Plan (such as rock cuts along the Safety Path between MP 45 and MP 48 to widen shoulders and improve visibility). (See Cooper Landing Walkable Community Project at http://www.walkcooperlanding.org/) Including these and other identified goals from the Cooper Landing Walkable Community Project Plan as additional mitigation measures would help to address the issues created by the Bypass Project.
  - The current Sterling Highway "Safety Path," constructed with State capital funding in 1993 provides a rudimentary trail along the north side of the highway between Sunrise Inn and Alaska Wildland Adventures, and will be partially cut off or annihilated by the proposed bypass, with no substitute pathway planned – essentially, we will lose the only safe trail along the current Sterling Highway west of Sunrise Inn at MP 45.

RESPONSE: During the Final EIS comment period, DOT&PF and FHWA were made aware of an informal trail (the "safety trail") that traverses the north side of the existing highway on the eastern end of the project area along Kenai Lake (between Quartz Creek Road and the proposed intersection with the Old Sterling Highway). This trail weaves in and out of the existing right-of-way and would be impacted with the highway realignment to the north. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to create a trail connection along the south side of the realigned Sterling Highway. This trail would connect from Quartz Creek Road to the Old Sterling Highway and use the remnant old highway where possible. At the western end, it would connect with the "safety path" that exists along the north side of the old highway that leads into Cooper Landing. The path would make this connection either in a pedestrian tube under the old highway (near its intersection with the Juneau Creek Alternative) or at an at-grade crossing farther along the old highway, pulled back from the intersection where the grades are more conducive to an at-grade crossing. The details of this connection will be determined during final design.

  - The Slaughter Ridge Trail, Bean Creek Trail, Coyote Notch Trail and others will be impacted by the bypass – mitigation for impacts to these recreation trails is necessary.

RESPONSE: Trail grade separations are proposed for the Resurrection Pass Trail, Bean Creek Trail, and Slaughter Gulch Trail.

An underpass in the MP 44–45 area, near Quartz Creek Road, was considered by engineers in preparation for the Final EIS. The topography is not conducive to providing an underpass in the MP 44–45 area. DOT&PF and FHWA have considered the trail needs along this stretch, and have agreed to

create a trail connection along the south side of the realigned Sterling Highway (to replace the informal path that was on the north side of the highway). This trail would connect from Quartz Creek Road to the Old Sterling Highway to connect with the "safety trail" there. From there, trail users could make their way to the north side of the highway using the Slaughter Gulch Trail undercrossing being installed under the new highway. Moreover, by replacing the current trail running on the north side of the highway to the south side, there will be considerably less demand to cross the highway in that location.

- This community has long desired assistance to help make bicycling and walking safer through the community. Pedestrian walkways would allow local residents and visitor to access on foot and at a slower pace a variety of trails and recreational amenities plus businesses who provide services. This could have the result of improving the economy of Cooper Landing by turning this area into a very walkable, accessible and desirable recreational center. It is also possible that these improvements would greatly offset the financial impacts on businesses who will suffer from the reduction in traffic along the "old" Sterling Highway section.

RESPONSE: Each of the build alternatives will have an 8-foot shoulder, which meets the safety requirements for bicycles and pedestrians along a rural principal arterial highway. Given the level of bicycle and pedestrian activity on the highway outside of Cooper Landing, DOT&PF believes the wider lanes and shoulders would sufficiently increase safety for pedestrians and bicyclists along the new highway segments. DOT&PF anticipates that the new highway will draw 70 percent of the traffic off the old highway, and the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway.

- Throughout the Cooper Landing Walkable Community Project's history, AK DOT&PF has told us "once the bypass is approved, we will get pedestrian paths through town." When they spent $23 million rehabilitating the Sterling Highway through town in 2013-2014 we were again told we'd get our pedestrian walkways "when the bypass goes through". Now we aren't even getting mitigation for one recreation trail… <u>We would like the promises to be kept!</u>

RESPONSE: The Sterling Highway project team has consistently indicated that the Sterling Highway MP 45–60 project would not be implementing the Walkable Community Project. The following response from the Final EIS has remained consistent over time.

"The Walkable Community Project, which is an adopted part of the Kenai Peninsula Borough Comprehensive Plan, is addressed in Section 3.2 and discloses where this project would address elements of the plan. It also explains that the MP 45-60 Project is not designed specifically to address the Walkable Community Project. DOT&PF anticipates that the new highway will draw 70% of the traffic off of the old highway and that the old highway would be reclassified to function as a minor arterial or major collector. This provides opportunities for the community to implement the Walkable Community Project on the old highway. Any further improvements or pathway projects on the "Old" Sterling highway would, however, need to be developed under a separate project." [See comment response 682 in Appendix J, *Comments and Responses on the Draft SEIS*.]

Improvements in the Walkable Community Project can competed for federal funds through the Community Transportation Program (CTP) or the Alaska Transportation Alternatives Program (ATAP) on a statewide basis. The Borough can also enter into agreement with DOT&PF for improvements funded by state appropriation, bonds, or road service funds.

As mentioned above, DOT&PF and FHWA have considered the trail needs where the project will impact the informal "safety trail" and have agreed to create a trail connection along the south side of the realigned Sterling Highway (to replace this informal path that was on the north side of the highway).

- **Other concerns with the bypass**
  - AK DOT should manage the proposed bypass to prevent new driveways from entering the highway – one large concern relates to the 1000 acre parcel of land west of Juneau Creek that will be transferred to the Kenai Peninsula Borough from the State of Alaska – it is imperative that access to these lands be from the existing Sterling Highway, and not the new highway bypass section. This has long been a recommendation of the community and is included in the Cooper Landing Land Use Plan, last revised in 1996. Concerns of fragmenting the community are the basis of this comment – we don't want to see a "Cooper Landing West" community develop.

RESPONSE: As is explained in Section 2.6.2 of the EIS, access to those segments of each alternative that would be built on a new alignment would be controlled and DOT&PF will not provide direct driveway access. For the Juneau Creek Alternative, DOT&PF has agreed to reserve access for a potential connection using ramps to the rural residential development on State Management Unit 395. A connection would also be reserved for the CIRI Tract A development near the connection of the old and proposed highway segments under the Juneau Creek Alternative. The new highway is intended to serve the mobility of through traffic. By not allowing additional new access roads and driveways, DOT&PF can keep that portion of the new highway functioning at a high level, improve safety, and reduce congestion. By not permitting driveway access, DOT&PF can also avoid inducing commercial development and sprawl. The pullouts and trailheads proposed in each alternative are to provide access where alternative access does not already exist and are part of negotiated mitigation for effects to recreational resources.

  - AK DOT should ensure that there are no pullouts or other areas where motorists can park off the bypass in "defacto" sites that will become unsanitary campsites, shooting ranges, etc. Any parking areas should be developed and managed with facilities for trash collection and restrooms.

RESPONSE: DOT&PF has agreed to complete a vegetation plan during final design and will be working with land managers to appropriately revegetate and restore impacted areas. The goal of revegetating waste disposal sites will be to return them to a natural state. By using design features, such as placing boulders or vegetation, DOT&PF will not allow unauthorized access to the restored areas, ensuring they do not become de facto rest stops or camp sites.

Thanks again for listening, Elaina. We look forward to future visits with you in Cooper Landing!

Sincerely,

Chris Degernes, Sandra and Ed Holsten, and Laura Johnson and the other members of the Cooper Landing Walkable Community Project