

Statter Harbor Improvements Project

Draft Environmental Assessment Comment Summary

The Statter Harbor Improvements Project draft Environmental Assessment (EA) was released on April 1, 2010; the comment period closed on May 17, 2010. Two alternatives—the Proposed Action and No-Action—were presented. More than 330 issue-specific comments were identified in 88 public e-mails, comment forms, and letters and 11 agency e-mails and letters received during the comment period.

Issue-specific comments fall within the following areas:

| | |
|--------------------|----------------------|
| Access/Land Use | Invasive Species |
| Air Quality | Mitigation |
| Alternatives | Permitting |
| Amenities | Process |
| Congestion | Purpose and Need |
| Cost | Safety |
| Cultural Resources | Social Impact |
| Cumulative Effects | Stakeholder Outreach |
| Data | Visual Impacts |
| Demand | Water Quality |
| Design | Wildlife/Fish |
| Habitat | |

Comments were classified as editorial (a question or clarification required within the document), substantive, or non-substantive. For the Statter Harbor Improvements Project, substantive comments are defined as “Comments that are within the scope of the proposed action, are specific to the proposed action, have a direct relationship to the proposed action and include supporting reasons for the Responsible Official to consider” (36 CFR 215.2). During the compilation and coding process, comments that could be interpreted as including supporting reasons for consideration were classified as substantive. Comments classified as substantive will receive a response describing how that comment was addressed in the Final EA. A comment/response table will be included as an appendix to the Final EA.

A summary of the substantive comments follows.

Public Comments

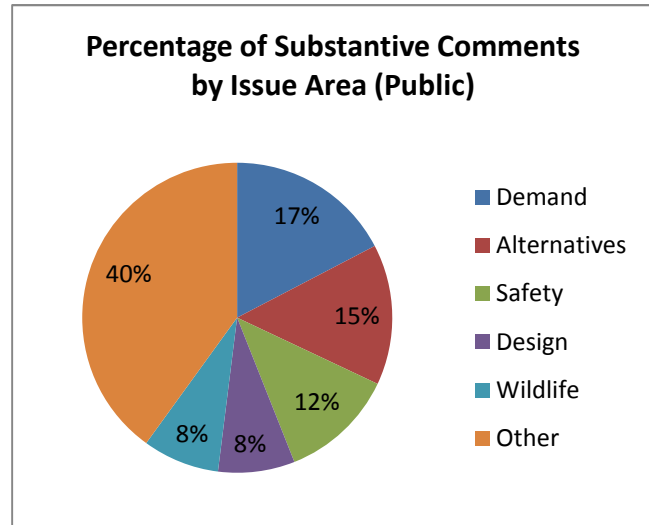
Of the 258 issue-specific comments identified from public e-mails, letters, and comment forms, 6 are considered editorial in nature, 177 non-substantive¹, and 75 substantive.

Alternatives

A number of commenters requested either more information on why certain alternatives were dropped from consideration or a reevaluation of the number and type of alternatives presented. Requests for reevaluations included considering the needs of both the fishing and non-fishing public as part of the evaluative process. Suggestions for changes to the Proposed Action alternative included eliminating parking at the top of the ramp to create a staging area, removing floats or parking to reduce the fill area, adding floats to hold boats, or blending the Proposed Action with options from other, alternatives considered but not carried forward for detailed analysis. Non-construction suggestions included using monthly parking permits to manage use, providing free parking for ramp users, increasing the launch permit fee, leasing additional parking from nearby businesses or using other (off-site) city-owned properties as supplemental parking locations, and adding a haul-out service. Construction alternatives suggested included fixing and retaining the existing ramps as additional motorized or non-motorized launch facilities or exploring the use of pilings. Suggestions for reducing congestion at Statter Harbor included the possibility of new or additional sites such as Tee Harbor or near the Auke Bay Ferry Terminal. Other commenters requested more information on how launch and retrieve operations would be segregated during peak periods, reserving shore-line areas for marine-dependent activities, and keeping existing highway access to the harbor.

Amenities

Comments on amenities requested maintaining pedestrian and open space near the waterfront, creating a waterfront promenade with recreation opportunities. Some requested relocating the shelter away from the parking lot and reusing in another—possibly off-site—location. One commenter requested educational kiosks be placed on-site to inform visitors of the history of the area, particularly Native history.



¹ Non-substantive comments generally included comments expressing general support or general opposition to the project without reference to alternatives or solutions, as well as comments that expressed unsupported opinions.

Congestion

One commenter suggested congestion at the launch ramps was caused by insufficient parking availability—that boaters need to leave the site to drop off or collect vehicles and trailers, blocking traffic in the harbor area. Another suggested that changes in mooring fees had resulted in congestion since fewer owners used permanent slips and trailered their boats to the launch instead.

Cost

Comments on cost were twofold: personal and project. One commenter suggested that higher fuel prices have decreased boating activity and demand for the site. Another commenter suggested the funds would be better spent revamping DeHart's Marina, which would have a smaller footprint.

Cultural Resources

A concern was raised about impacts to sites of potential cultural importance; the commenter requested consultation with the Auke Tribe.

Cumulative Effects

Comments were raised about the long-term impacts to eel grass beds, water circulation, Essential Fish Habitat of forage species, salmon, from vessel traffic on marine mammals, from other development in the area, and to residential areas—particularly noise impacts; commenters requested more work be done on the cumulative effects chapter of the EA.

Demand

One of the primary areas for comment centered on need: the need for more parking, less parking, or requests for studies that confirmed the proposed number of spaces. Some commenters requested more studies be performed—or more data gathered—that confirmed assumptions about capacity and demand, both for motorized and/or non-motorized use, particularly looking at additional capacity from other harbor and launch facilities within the vicinity of Juneau. Some requested the analysis also consider a growth (or decrease) in projected boat traffic over time. One commenter noticed an apparent contradiction within the document: section (6.5) states the proposed facility would handle up to twice as many launches, while another section (6.7) states that use of the facility is not expected to increase substantially. The same author suggested that statements regarding traffic levels be reconsidered once a traffic level prediction is made.

Design

As opposed to comments on alternatives, which suggested new build or no-build options, comments on design centered on changing aspects of the Proposed Action alternative. These included: adding a degree or two of steepness to the ramps, using high-quality (non-plastic) plumbing and electrical fixtures, relocating the park structure elsewhere on site (generally to the waterfront area), and reducing parking spaces to increase open space. One commenter requested adding float length for tying up

vessels at low tide (which would require shifting the float alignment north at the seaward end). Another commenter suggested changing traffic flow to one-way traffic in the parking lot near the existing boat yard and near Auke Bay Towers Condominiums, which would allow more flexibility for boat trailers in otherwise narrow areas. Also related to traffic flow, one commenter suggested that the Proposed Action alternative would shift highway vehicle access to a location near a “blind” corner in a congested school zone.

Habitat

The majority of comments on habitat addressed impacts to eel grass beds and wetlands. Some commenters requested additional studies on the impacts to wildlife from the possible reduction of habitat, increased sedimentation, and changes to circulation. One commenter suggested that the EA could research best practices from similar projects adjacent to similar habitats in an effort to identify opportunities to minimize impacts. Others suggested eliminating the picnic shelter and maximizing parking on upland areas to reduce the fill area.

Process

Based on the amount of potential impact, some commenters suggested a higher level of environmental review—that an Environmental Impact Statement was more appropriate than an Environmental Assessment.

Safety

Commenters were concerned about safety, although comments were mixed on if the improvements would make the project area safer (for pedestrians) or less safe (because of increased traffic). One commenter worried that the non-motorized ramp would increase safety problems because kayakers would need to cross the harbor and launch ramp areas. Another wrote that insufficient parking at the existing ramp created unsafe conditions because it required drivers to park along local roads with narrow shoulders and cross busy roadways to return to the launch. Other commenters suggested that the incidents of boat collisions would increase because of the confined space leading to two ramps; some of these commenters suggested increasing the number of ramps to four to reduce pinch points and enable boaters to launch and retrieve their boats more effectively. Some commenters worried about pedestrian safety not only from parking off-site and crossing “traffic jam” scenarios, but from harbor access in the area of a school zone. One commenter suggested removing the floats at DeHarts first, which would also reduce the fill area required in the Proposed Action alternative.

Social Impacts

Some commenters requested the EA do more to identify and address social impacts, particularly noise, congestion, and loss of open space.

Stakeholder Outreach

A number of comments expressed disappointment in how the project—and public process—has been communicated. Additional meetings and materials were requested.

Visual Impacts

Commenters disagreed with the EA's finding that "the viewshed is not anticipated to change significantly."

Wildlife/Fish

Some commenters provided observations of harbor seals and otters in the harbor area, as well as bird and marine mammal sightings. Commenters expressed concern about how possible changes to food sources (such as herring) and habitat would affect wildlife.

Agency Comments

Of the 79 issue-specific comments identified from agency e-mails and letters, 8 are considered editorial in nature, 13 non-substantive, and 58 substantive.

Access/Land Use

One comment indicated the proposed fill would eliminate access—including recreational access—to tidelands in Auke Bay and suggested the EA evaluate how uplands and tidelands are used in order to determine potential impacts to public use.

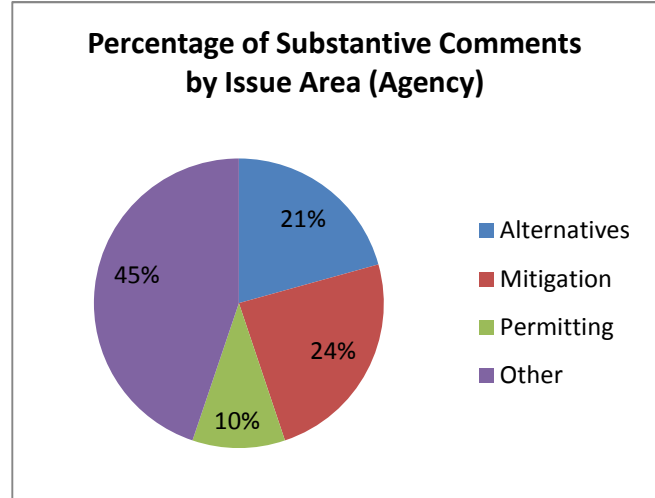
Air Quality

One commenter noted that the project area was near an elementary school and there might be temporary, localized impacts to air quality from construction.

Alternatives

Comments on alternatives questioned why previously identified alternatives were dropped from consideration and what metrics were used to make those determinations. Comments requested additional demonstration of why alternatives were not considered practicable and many asked for reconsideration of all or some of the discarded alternatives, which, without additional evaluation, appear to be available, capable of being done, and would meet the project purpose. This reconsideration was considered important, particularly for the separate US Army Corps of Engineers Section 404 alternatives analysis and for identifying the least environmentally damaging practical alternative (LEDPA). A number of comments noted that the project is in a “special aquatic site” and requested confirmation of other alternatives that could be less damaging to the aquatic environment. One comment encouraged consideration of existing, advanced technology in development of practicable alternatives. Specific recommendations for alternatives to consider included:

- Alternatives that utilize the existing ramp location for construction of the new boat launch ramp to the necessary length and width.
- Alternatives that re-align or close Auke Bay Harbor Road, and the development of access at other locations besides the Horton Lot.
- Alternatives that reconfigure the existing uplands to provide additional parking spaces, and designate Horton Lot for particular users (e.g., short/long-term parking, trailers, etc.).
- Alternatives that acquire specific additional upland parcels.
- Alternatives that include construction of multi-level parking structures within the existing footprint of the main parking lot.



- Alternatives that utilized partial fill and partial pile development.
- Alternatives recommended or based closely upon the 2005 Statter Harbor Master Plan.
- A reevaluation of the existing developed boat launch and harbor facilities, other developed or undeveloped parcels at other locations, and possible acquisition of other parcels.

Some comments also suggested non-build measures that might be employed to reduce the discharge of fill. These included:

- Limiting use of the harbor facility to current parking capacity.
- Directing over-flow traffic to less used launch/harbor facilities.
- Enforcing parking violations.
- Prohibiting parking on sites within the project vicinity to eliminate unsafe or crowded conditions.

Other comments suggested reducing the proposed amount of fill by removing floats at DeHart's Marina (using funds from the City and Borough of Juneau rather than Dingell-Johnson/Wallop-Breaux and matching State dollars).

Cost

One commenter requested detailed cost estimates and breakdown analysis for each alternative considered.

Cultural Resources

One commenter requested including the response from the State Historic Preservation Officer to the U.S. Fish and Wildlife Service showing concurrence to the finding of "no potential to affect" historic structures.

Cumulative Impacts

A number of commenters requested additional analysis of cumulative effects on water quality and habitat (Essential Fish Habitat); additional baseline studies were requested.

Data

Requests for additional studies or information were proposed for air quality, coastal zone, wetland and other aquatic resource habitats, invasive species, hydraulics and geomorphology, land use, recreation and public use.

Demand

One commenter questioned the amount of parking created by the Proposed Action alternative based on documented parking needs.

Design

One commenter requested shifting the location of the shelter to the southwest corner of the site, which would not require additional fill or reduce the overall availability of parking while retaining the coastal viewshed.

Habitat

Comments regarding habitat centered around intertidal and eel grass habitats. Commenters requested the EA include the scientific basis for the assumption that placement of fill in 3.9 acres of estuarine intertidal habitat would not impose significant adverse impacts on habitat in the project area, and requested monitoring and protection activities for the eel grass habitat.

Invasive Species

One commenter requested that the potential for introduction of invasive species from construction equipment be referenced in the EA.

Mitigation

Commenters noted that the conveyance of lands at Bridgette Cove and Auke Nu are not eligible as mitigation; tide and submerged lands beyond the project boundaries are not eligible for conveyance. Others suggested that acquiring and using upland property within the project vicinity to accommodate parking would avoid and minimize impacts to the aquatic resources. Comments also requested the EA include sufficient information about how the proposed compensatory mitigation relates to individual and cumulative impacts, how restoration and replacement of permanently lost habitat values would be accomplished, and requested development of on-site in-kind (and additional) mitigation plans.

Permitting

Comments regarding the permitting process requested diagrams that include only the tidelands necessary for the improvements and include a more rigorous alternatives analysis that would satisfy Section 404(b)1 guidelines. A recommendation related to the analysis of practical alternatives was to include costs, existing technology, and an assessment of the project impacts to aquatic resources under the various alternatives, including a discussion of the details and benefits of any proposed compensatory mitigation and information on steps to minimize the effects of discharge on the aquatic ecosystem (such as an evaluation of non-water uses).

Process

One comment suggested that the EA may need to be supplemented before the U.S. Army Corps of Engineers could issue an authorization.

Purpose and Need

Commenters requested specific metrics and additional quantification of the need to improve safety and increase harbor efficiency.

Safety

One commenter asked if the location of the new driveway (across from the elementary school) had been assessed for impacts to pedestrians.

Water Quality

Commenters questioned how the proposed fill would affect Bay Creek and the eelgrass beds, either through sedimentation or channel cutting. Some wondered if the project would change circulation patterns, which would modify the rate and locations of erosion or accretion. Requests were made to include information on indirect effects on areas adjacent to and in proximity to the entire fill area (not just on the intertidal channels), and to provide a scientific basis for the conclusion that the potential change in circulation patterns would not have significant adverse impacts on Essential Fish Habitat or fish.

Wetlands

One commenter requested the EA and all drawings for permit applications include delineations showing the proposal relative to jurisdictional boundaries (high tide line, mean high water, ordinary high water, or wetland boundaries).

Wildlife/Fish

Commenters requested the EA include a more detailed analysis of the effects of the Proposed Action alternative and other alternatives on Lynn Canal herring, provide a scientific basis supporting the statement that fish species would move successfully to similar habitat (and there would be no significant adverse effects on these species), and defend the statement that the project would not likely adversely effect Essential Fish Habitat and fish species.