

Lynn Canal Conservation, Inc.
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July 8, 2013

To: Haines Borough Planning Commission

We, the undersigned, feel that the Haines Highway Improvement Project as currently proposed could negatively impact local fishing and tourism industries as well as subsistence and cultural values in the Haines area. We ask that the Alaska Department of Transportation (DOT) utilize all options available for design flexibility or seek a federal exception to design standards in order to protect environmental, scenic, historic, and Native cultural resources as well as salmon and eagle habitats in the world-class Alaska Chilkat Bald Eagle Preserve located on the Haines Highway National Scenic Byway.

Current plans require cutting hundreds of resting and roosting trees within 'critical resting/roosting areas' upland of the Chilkat River Critical Habitat area in the Preserve. Proposed highway speed of 55 mph will likely increase eagle mortality if curves following the river are replaced by a straight alignment.

Reconstruction plans include destruction of anadromous fish habitat, destruction of sloughs which support diverse species year-round, diversion of streams, and extensive use of riprap in the Chilkat River. "Generally, streams with healthy riparian vegetation communities and the habitat features associated with such communities (shade, relatively stable undercut banks, large woody debris, etc.) will be harmed ecologically from the addition of riprap structures." (Fischenich, J. Craig. "Effects of Riprap on Riverine and Riparian Ecosystems," U.S. Army Engineer Research and Development Center, 2003)

In other areas riprap is being removed. In order to improve habitat complexity for Chinook salmon on the Suiattle River in Washington State, one quarter mile of riprap was removed because "rip-rap bank protection structures damage salmon habitat by reducing habitat complexity, degrading river bank functions and limiting the formation of secondary channels and off-channel habitat in the floodplain. Complex, natural habitat along river channels provides important foraging and resting opportunities for juvenile Chinook salmon."

<http://www.heraldnet.com/article/20111212/BLOG50/111219930>

In some sections, highway improvement plans diminish the scenic value of the Haines Highway National Scenic Byway. Sections that diverge from the meandering Chilkat River detract from scenic aspects of the byway. "When possible, the alignment should be designed to enhance attractive scenic views, such as rivers, rock formations, parks, historic sites, and outstanding buildings. The designation of certain highways as scenic byways recognizes the importance of preserving such features along our Nation's roadways." (U.S. Department of Transportation, Federal Highway Administration, "Flexibility in Highway Design")

We respectfully request the Haines Borough ask DOT not proceed with the proposed highway improvements until DOT implements flexible design measures or federal exceptions that will protect the local resources of the Haines Highway corridor.

Sincerely,

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