

To: The Mayor, Assembly Members, and the Manager  
From: Ellen Larson, Haines Resident

### **I have 3 major concerns re the Lutak Dock.**

1. The purpose and need statement in the NEPA (National Environmental Policy Act) Environmental Assessment and on p. 3 of the Army Corps of Engineer permit application clearly states:

*"The purpose and need of the project is to MAINTAIN existing freight and cargo capacities at Lutak Dock so the Haines area has reliable, safe, and economic barge service for the foreseeable future."*

But the current design would INCREASE the existing capacity of the dock by accommodating Handymax ships and expanding the available uplands. This does not align with our purpose and need statement, which is driving the Environmental Assessment.

2. NEPA law requires that a RANGE of alternative designs that meet the purpose and need of the project be provided.

According to the Council of Environmental Quality who oversees NEPA implementation:

*"One of the primary purposes of NEPA is to identify, through the evaluation of project alternatives, ways in which the environmental effects of a project can be avoided or minimized while still satisfying the primary objectives of the project."*

I know that there is concern about the grant deadline, but the NEPA requirements supersedes the grant deadline. Not meeting them could potentially delay the project even more, and result in missing the Sept. 30 deadline.

Chilkat Indian Village has voiced their support of a smaller, scaled back design.

But so far, no minimalist alternative designs have been submitted and approved by the assembly.

### **3. I'm perplexed.**

We have been repeatedly told that the dock is not going to be used for ore transfer, and Gabe Thomas even advocated to put the Ore Transfer issue on the ballot for a vote.

**> So why was an overbuilt dock designed that can transfer ore?**

**> And why was a scaled down, minimalist option not provided as required by NEPA?**

In order to be in compliance with the NEPA Environmental Assessment review requirements, I ask that the borough assembly do the following:

Adopt a motion that an alternative, minimalist, dock design be developed and included in the Environmental Assessment that meets our community's needs WITHOUT increasing existing capacity. This alternative design will be overseen, reviewed, and approved by the borough assembly, along with the entire draft Environmental Assessment.

The R&M design 3B from 2017 could be downsized with modifications to serve as a true minimalist alternative.

**It is critical for the Assembly to have a seat at the table for the entire grant process.**

Thank you for listening and for your thoughtful and ongoing service to our community.