

Alaska Chapter of Backcountry Hunters & Anglers
(Alaska BHA)

Comments on May 8, 2025 Planning & Environmental Linkage Draft
Juneau-Douglas North Crossing Study Report

June 9, 2025



Introduction

Alaska BHA's view on the [Juneau Douglas North Crossing PEL Draft Study Report](#) are that while markedly improved over DOWL's earlier public North Crossing documents, there are several concerns with scoring and provision for a defensible basis for moving forward with preparations of an Environmental Impact Statement (EIS). BHA's comments provide rationale for this and the insufficient use of the PEL, which is to more economically eliminate detrimental and unfeasible alternatives for a project, which this PEL has failed to do. There are numerous direct and indirect adverse impacts of this project on the values, functions, and public uses of the Mendenhall Wetlands State Game Refuge (MWSGR), which are not captured in the Draft Study Report.

Alternatives: Scoring, Ranking, Elimination

The scoring and ranking of alternatives in the final draft of the PEL report is an improvement relative to the earlier PEL draft scoring circulated previously to the Advisory Committees. This draft is more consistent with the comments and suggested rankings of alternatives proposed by Mendenhall Wetlands Study Group, with which Alaska BHA has worked with tangentially, given their collective expertise, being composed mainly of Fisheries Biologists, Wildlife Biologists, Habitat Biologists, Habitat Mapping and Evaluation Specialists, Naturalists, Natural Resource Managers.

The Preliminary Planning and Environmental Linkage (PEL) study was designed to identify viable alternatives for a second crossing over the Mendenhall Wetlands while minimizing impacts to public resources and uses. The current proposal to forward five build alternatives is no different than the status after Level 1 screening (before MP was retroactively reinserted) and is contrary to your own findings and the project goal to avoid, minimize, and mitigate impacts to the environment. The review should support eliminating three of the five proposed alternatives—Sunny Point East, Sunny Point West, and Vanderbilt—due to their significant environmental, viewshed, regulatory, and user conflicts, particularly with the Mendenhall Wetlands State Game Refuge. The analysis shows that only the Twin Lakes and Salmon Creek alternatives would meet the project's purpose and need while allowing a deeper analysis as to how damage to wetlands, wildlife, and waterfowl hunting opportunities could be mitigated. Despite comments suggesting there is “no way to tell the alternatives apart,” the analysis, especially when informed by superior wetland data from SEAL Trust's WESPAK-SE inventory (<https://www.dropbox.com/scl/fi/85hfud0aujifeqwl4dz5r/2024-Taashuyee-Assessment-Report.pdf?rlkey=28nkxfosmyygi6il83th364an&e=2&st=j2dsnfue&dl=0>), demonstrates meaningful distinctions in impact between routes. Additionally, the limited time savings among alternatives—just a minute or two—further supports the elimination of high-impact options. The report urges that only the two least damaging options be carried forward into the Environmental

Impact Statement (EIS) process and argues that the PEL, as currently written, should not be fully incorporated into the NEPA process without substantial improvements in its environmental analysis and transparency.

Problems with the Draft PEL Report and Recommendations for Improvement

The draft PEL (Planning and Environmental Linkages) report fails to adequately differentiate environmental and human-use impacts among the crossing alternatives under review. A narrow and inconsistently applied scoring rubric (typically ranging from -2 to 2) obscures real differences between routes, and several alternatives with substantial impacts were inaccurately rated as having “no impact.” The scoring lacks transparency, particularly with the introduction of a new “refuge weighting” scheme that excludes off-refuge resources and appears arbitrary. Additional shortcomings include ignoring Douglas Island impacts, failing to assess habitat fragmentation and hydrological effects, and omitting key datasets such as updated wetland assessments, bird usage data, and recently identified anadromous streams.

Some errors are significant—for example, the Mendenhall Peninsula (MP) alternative was rated inaccurately due to flawed refuge-weighting logic and poor wetland delineation. Additionally, elements like roundabouts on the Douglas Island side were not properly mapped or assessed, and the Vanderbilt alternative’s footprint was truncated without explanation. These issues weaken the integrity of the report’s findings and undermine public trust in the process.

To qualify for use under NEPA, the PEL must meet federal standards for agency consultation and systems-level analysis. The Alaska Department of Fish & Game (ADF&G), as the managing authority for the Mendenhall Wetlands State Game Refuge, must be meaningfully involved in evaluating alternatives that cross the refuge. Under Section 4(f) of the National Transportation Act and related agreements, no alternative impacting the refuge can be approved without proving no prudent alternative exists and that all harm will be minimized. Yet ADF&G’s role in this critical evaluation is not reflected in the draft PEL. Furthermore, the PEL’s environmental analysis fails to evaluate corridor-wide effects—such as loss of salt marsh, impacts to bird habitat, or increased traffic pressure on North Douglas Highway—and largely overlooks cumulative ecological and public use impacts. Substantial revisions are required to meet NEPA incorporation standards and provide credible guidance for future project development.

The PEL report fails to meet several key conditions required for incorporation into the NEPA process, particularly regarding the use of reliable, current data and scientifically valid methods (Condition 7), and sufficient supporting detail for conclusions (Condition 8). Critical issues include inaccurate wetland and bird data, misused or missing habitat and stream mapping, inconsistent and opaque scoring methods, and the lack of logic in eliminating environmentally damaging alternatives like the MP route. The report overlooks key wetland types, fails to differentiate tidal versus non-tidal wetlands, and does not use available high-quality mapping and

imagery. Its scoring and conclusions are unsupported and selectively applied—omitting top-performing alternatives like Salmon Creek while relying on undisclosed mitigation plans to justify advancing others. These flaws, combined with misleading maps and a non-transparent process, render the PEL report inadequate for incorporation into NEPA (Condition 9) without substantial revision, though the purpose, need, and alternatives sections could potentially be salvaged if significantly improved.

Factual errors in PEL Study Draft

The draft PEL report contains numerous factual inaccuracies that should be corrected in the final version. These include outdated or incorrect waterfowl hunting season dates, misidentification of species (e.g., “otter” instead of “river otter”), and incorrect claims about Southeast Alaska Land Trust parcels being within the refuge when they are actually adjacent. Wetland data contains several errors, such as missing freshwater wetlands, misclassified tidal wetlands, and inconsistencies in identifying estuarine and intertidal areas. The report's wetland survey appendix is particularly flawed, with inconsistent definitions, miscounted habitats, and missing delineation documentation. Regulatory information is also incomplete, lacking adequate explanation of Army Corps of Engineers (ACOE) jurisdiction under Sections 404 and 10, and their relevance to refuge and wetland protections. Additional mistakes include inconsistent Essential Fish Habitat descriptions, inaccurate anadromous stream and trail data, omission of the high-scoring Salmon Creek alternative from summary tables, and an outdated map of the Vanderbilt alternative that underrepresents its footprint and impact.

Hunting and Fishing Impacts

The Mendenhall Wetlands are one of the most ecologically important habitats in Alaska, recognized globally as an Important Bird Area (IBA) by the National Audubon Society. A 5,000-acre ecosystem provides essential habitat for millions of migratory birds traveling the Pacific Flyway each year—including sandpipers, dowitchers, plovers, and waterfowl. These wetlands are also a critical nursery for salmon and trout, with rich tidal channels that shelter juvenile fish before they head to sea. The Mendenhall Wetlands have been called the [Heart of Juneau](#). It's not just birdwatchers and fishers who value the space. The Mendenhall State Game Refuge was designated in 1976 by the Alaska State Legislature. It was in part designated so hunters could pursue waterfowl and have an accessible place to hunt. In 2023, the Alaska Department of Fish & Game added over a dozen anadromous fish streams to the Anadromous Waters Catalog (AWC) of fish streams after surveying the wetlands. A total of 230 species of birds have been documented within the wetlands – that's 69% of the 335 bird species for all of Southeast Alaska – including 36 different waterfowl species, according to [Audubon Alaska](#). The Mendenhall Wetlands support one of Southeast Alaska's most popular and accessible waterfowl hunting

areas, drawing hunters from across the region each fall and over 1800 annual local resident hunters (ADF&G).

The lack of scientific species and habitat analysis in all drafts of the PEL are deeply concerning for hunters and anglers. Identifying the waterfowl habitat and acknowledging the anadromous fish streams and the potential and likely adverse effects, compromises Alaskan's way of life and the intent of the designation of the Mendenhall Wetlands State Game Refuge.

Conclusion

Alaska BHA appreciates the opportunity to comment on this complicated and prolonged PEL process. We sincerely hope and expect that you will consider our investment of time and attention to this project, as well as the expertise of the Mendenhall Wetlands Study Group, Audubon, and the Southeast Alaska Land Trust, whose experienced and collective contributors offer countless decades of expertise. Our community, and the greater public of the State of Alaska expect and deserve efficient and rational planning for our precious and limited public financial and environmental resources.

Juneau, and the State of Alaska does not need another expensive, new road project. What we need is leadership that respects our budget, our wildlife, and our way of life. Preserving the Mendenhall Wetlands as a globally important ecosystem, a rich fish and wildlife habitat, and a cornerstone of Southeast Alaska's outdoor traditions is not just the right thing to do—it's the smart thing.

Let's repair what is broken. Let's maintain what is working. And let's leave the Mendenhall Wetlands wild for the generations of Alaskans yet to come, like nature, and the state legislature intended.



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