

June 9, 2025

Alaska Department of Transportation & Public Facilities
Southcoast Region
PO Box 112506
Juneau, AK 99811-2506

To Whom It May Concern:

On behalf of the National Audubon Society and our members in Alaska and across the country, thank you for the opportunity to provide comments on the Juneau Douglas North Crossing (JDNC) Planning and Environmental Linkages (PEL) Study. We appreciate the Alaska Department of Transportation & Public Facilities' (DOT&PF) commitment to public service and community engagement.

We write to express opposition to any alternative that proposes a second crossing through the Mendenhall Wetlands State Game Refuge (Refuge). We respectfully urge the project team to eliminate from further consideration all four refuge-crossing alternatives—West Sunny Point, East Sunny Point, Vanderbilt, and Twin Lakes—and to advance off-refuge alternatives—No Build, and Salmon Creek—that achieve transportation goals while preserving critical ecological function of the Mendenhall Wetlands.

Importance of the Mendenhall Wetlands for Migratory Birds

The Mendenhall Wetlands are one of the most important bird habitat complexes in Southeast Alaska. The refuge supports over 268 species of birds annually and is widely acknowledged to be one of the key migratory waterfowl and shorebird stopover locations of Southeast Alaska. In 2005, National Audubon Society designated the ~4,500-acre wetlands complex as an Important Bird Area due to their hemispheric significance for migratory waterbirds. This is a vital stopover and breeding site for tens of thousands of migratory waterbirds, particularly during spring and fall migrations. The Mendenhall Wetlands complex, known as Taashuyee-Chookan.aani, is located on Lingít Aaní—the ancestral lands of the Tlingit, Haida, and Tsimshian peoples and is an important area for subsistence practices.

Species that depend on these wetlands include Western Sandpiper (*Calidris mauri*), Surfbird (*Aphriza virgata*), Greater White-fronted Geese (*Anser albifrons*), Surf Scoter (*Melanitta perspicillata*), and additional birds identified as priority species in Audubon's Alaska WatchList: Yellow-billed Loon (*Gavia adamsii*), American Golden-Plover (*Pluvialis dominica*), Lesser Yellowlegs (*Tringa flavipes*), Red Knot (*Calidris canutus roselaari*), Pectoral Sandpiper (*Calidris melanotos*), Sharp-tailed Sandpiper (*Calidris acuminata*), Black-legged Kittiwake (*Rissa tridactyla*), Marbled Murrelet (*Brachyramphus marmoratus*), Rufous Hummingbird (*Selasphorus*

rufus), and Orange-crowned Warbler (*Leiothlypis celata*) (Armstrong et al. 2009, Warnock et al. 2017). Audubon's Migratory Bird Explorer tracking data illustrates the diverse connectivity of 48 species of migratory birds that have been documented to use the globally recognized [Mendenhall Wetlands Important Bird Area](#). The wetland complex serves as critical stopover and wintering location along the Pacific Flyway, linking nesting and wintering habitats across the Americas. Habitat fragmentation and disturbance in the wetland would disrupt these species' life cycles and diminish habitat quality at a critical point in their annual journeys.

Bridge development through the Refuge would cause irreversible impacts to these birds by altering the refuge's estuarine hydrology, fragmenting habitat, and introducing permanent sources of noise, light, and human disturbance. Such development would undermine the ecological functions that make the refuge valuable—not only to birds, but also to fish, invertebrates, and the broader ecosystem.

Feasible Off-Refuge Alternatives Exist

Constructing transportation infrastructure through the Mendenhall Wetlands State Game Refuge directly conflicts with the refuge's founding purpose. Created in 1976, the Refuge was established to protect vital habitat for migratory birds, fish, and other wildlife. Under Alaska law, state game refuges are managed to conserve wildlife populations and habitats. Advancing Refuge-crossing alternatives would violate this mandate and contradict long-standing public expectations for the conservation and management of designated protected public lands.

Importantly, the PEL Study identifies one off-Refuge alternative—Salmon Creek Alternative—that is technically feasible and capable of meeting the project's purpose and need. The Salmon Creek and the No Build alternatives avoid the significant environmental, legal, and social costs associated with a Refuge crossing. The Salmon Creek option would improve connectivity, reduce congestion, and enhance emergency response without undermining Southeast Alaska's most valuable wetlands complex.

Moreover, these alternatives are better aligned with climate resilience goals and responsible land-use planning. Intact wetlands provide critical services such as flood protection, carbon storage, and climate buffering—all of which will become increasingly important as Juneau faces climate-related challenges in the coming decades.

The public has consistently expressed concern about development within the Mendenhall Wetlands. Feedback from community members, conservation organizations, and Indigenous communities during the PEL process has underscored widespread support for off-Refuge alternatives. A transportation solution that respects ecological integrity and reflects local values will yield greater public trust and long-term community benefits.

The Mendenhall Wetlands State Game Refuge is a natural asset of regional, national, and hemispheric importance. It is irreplaceable habitat for migratory birds and a cornerstone of the community of Juneau's ecological health and wellbeing. These wetlands are also a haven for wildlife enthusiasts as they are fishing and hunting areas with vital spawning grounds for anadromous fish. Building a crossing through this Refuge would cause irreversible harm and set a damaging precedent for other state game refuges across Alaska.

We urge the Alaska DOT&PF to remove the most impactful Refuge-crossing Level 2 alternatives from further consideration (East and West Sunny Points and Vanderbilt) and to move forward with off-Refuge, low-impact alternatives in the next phase of environmental review. Thank you for your leadership in evaluating infrastructure options that serve both transportation needs and environmental stewardship.

Sincerely,

A handwritten signature in cursive script that reads "River Gates".

H. River Gates

Pacific Shorebird Conservation Initiative Coordinator

Literature cited:

Armstrong, R. H., R.L. Carstensen, M. F. Willson, M. Hermans Osborn 2009. The Mendenhall Wetlands: a globally recognized Important Bird Area. Nature Alaska Images. Juneau, Alaska, 99801.

Warnock, Nils 2017. The Alaska WatchList 2017. Audubon Alaska, Anchorage, Alaska.