

Mendenhall Wetlands Study Group
Comments on May 2025 Planning & Environmental Linkage
Draft Juneau-Douglas North Crossing Study Report

June 8, 2025

Introduction

The Mendenhall Wetlands Study Group (MWSG) considers the [Juneau Douglas North Crossing PEL Draft Study Report](#) an improvement over DOWL's earlier public North Crossing documents. However, the report falls short of providing a defensible basis upon which an Environmental Impact Statement (EIS) could be prepared. Our comments explain our reasons for these conclusions and how crossing alternatives have been insufficiently analyzed as to the direct and indirect adverse impacts they each are expected to have on the values, functions, and public uses of the Mendenhall Wetlands State Game Refuge (MWSGR).

Section 1 - MWSG Position

Study Group Qualifications

The MWSG is a collection of individuals with many decades of experience as scientists, resource managers, and/or Mendenhall Wetlands users, that was formed to provide review and expert advice to the PEL Study and NEPA process. The group is composed mainly of people having had careers as Fisheries Biologists, Wildlife Biologists, Habitat Biologists, Habitat Mapping and Evaluation Specialists, Naturalists, and Natural Resource Managers, as well as in senior natural resource agency positions. Many of the studies we have referenced for the PEL team's use in our January 30, 2023 and April 10, 2024 comments and recommendations were conducted and written by members of our study group.

Scoring and Ranking of Alternatives

The scoring and ranking of alternatives in this final draft of the PEL report is a substantial 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 MWSG and other Technical Advisory groups, with the exception of the scoring for the Mendenhall Peninsula (MP).

Excluding MP, the scores in the new draft clearly show a northwest-southeast gradient of decreasing environmental impacts for the alternatives, with Salmon Creek (SC) and Twin Lakes (TL) having scores that are significantly better than Vanderbilt (VB), East Sunny Point (ESP) or West Sunny Point (WSP).

Elimination of Alternatives

The intended and announced purpose of the PEL was to review potential crossing routes and forward for analysis in a full EIS under NEPA the alternatives that meet the purpose and need for the project and minimize impact on valued public resources and uses. The PEL can achieve its intended purpose by forwarding the two viable crossing options that meet the purpose and need for the project after eliminating the alternatives with the most excessive environmental impacts, viewshed impacts, potential airport conflicts, and severe regulatory constraints.

The current proposal to forward five build alternatives is essentially where things stood 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. Analyzing that many crossing alternatives will cost more time and money when there is enough information available at the PEL Level 2 to eliminate the costliest and most damaging alternatives, limiting recommendations to only the alternatives that meet the purpose and need and have a chance to be permitted and built.

We agree with the elimination of the Mendenhall Peninsula alternative for cost reasons. In addition, the impacts to wetlands and fish and wildlife of that crossing would be much higher than the PEL Level 2 analysis indicated. Therefore it should be removed from further consideration due to cost and excessive potential impacts to wildlife resources and uses.

We concur with the general order of your ranking of the five remaining build options from greatest to least impact (Sunny Point East and West, Vanderbilt, Twin Lakes, Salmon Creek). This order agrees with the general ranking we suggested in our previous comments and is similar to the overall function/value scores for these areas in the WESPAK-SE tidal wetland functional assessment done for the Southeast Alaska Land Trust (<https://www.dropbox.com/scl/fi/85hfud0aujifeqwl4dz5r/2024-Taashuyee-Assessment-Report.pdf?rlkey=28nkxfosmyygi6il83th364an&e=2&st=j2dsnfue&dl=0>).

Your analysis shows that the two Sunny Point options and Vanderbilt are significantly more impactful to Mendenhall Wetlands State Game Refuge (MWSGR, Refuge) resources and uses than the Twin lakes and Salmon Creek options. Despite our criticisms we find the PEL Level 2 analysis adequate, even without suggested improvements below, to eliminate the Sunny Point East and West, Mendenhall Peninsula and Vanderbilt crossing alternatives from further review under an EIS. Further, carrying forward only the two least damaging alternatives would comport with the regulatory requirements of the Army Corps of Engineers, ADOT/PF 4(f), and ADF&G refuge regulations.

At the Open House on May 15, 2025 DOWL and CBJ staff stated that “there is no way to tell the alternatives apart” as justification for forwarding five build alternatives. We do not believe this is

true. Despite the limited scoring range, the PEL analysis shows significant differences in the overall ratings between the alternatives.

The much better wetland data available through the SEAL Trust wetland inventory and WESPAK analysis was available to DOWL and should have been used for the PEL. Utilizing this high quality inventory of wetlands and their functions and values from the SEAL Trust WESPAK-SE function/value scores would have reinforced the relative ranking of the alternatives in the PEL analysis and shown even greater impact than those shown under the current PEL ranking metric on the wetlands, fish, and wildlife of Sunny Point and Vanderbilt compared to the Twin Lakes and Salmon Creek options.

Further, restricting analysis of impacts to just the footprint of each crossing also leads to significant underestimation of the negative impacts of the Sunny Point and Vanderbilt alternatives on wetland functions and uses of the Refuge. These impacts can extend laterally beyond a bridge, the distance and timing depending upon such factors as sea floor substrate and habitat type, tidal dynamics, and disturbance to movement and use by wildlife. A defensible EIS prepared under NEPA requirements would have to include an adequate analysis of impacts extending beyond each actual crossing footprint. If the final PEL report is to lay the intended groundwork for a possible EIS, then it too needs to identify and describe these adverse impacts and values in at least a general way.

As for bridge structures themselves, we agree with the PEL finding that they should be entirely piling supported. This mitigation measure would allow the least possible impediment to natural seawater flow beneath a crossing. Any solid fill support should be limited to bridge abutments, and they should extend no further from shore than is necessary to meet safe engineering standards, and not simply because solid fill support may be less expensive than installing pilings. These same principles should also apply to any highway interchange structures within flowing waters, including tidelands.

Human use of the Refuge will also be negatively affected well beyond the footprint of a crossing structure. The PEL mentions, in passing, the impact of the two Sunny Point alternatives on waterfowl hunting. This issue rates more than passing mention as ESP, WSP, VB, and MP will have far more significant negative impacts on waterfowl hunting than TL and SC. Alaska Department of Fish & Game (ADF&G) hunting data available to the public shows that the Sunny Point alternatives directly impact the most heavily used hunting area on the Refuge. It is likely that, given the conflict between hunting and roadways recognized in CBJ firearm discharge limitations and State of Alaska hunting regulations regarding shooting from or across a public road, a significant area on each side of both Sunny Point crossing structures will be closed or unavailable for hunting. A Vanderbilt crossing will have less impact on hunting than the Sunny Point alternatives, but given the restrictions noted above, would also have a significant negative

impact on waterfowl hunting in the Refuge and would disrupt major seasonal use areas of regional importance to waterfowl. On the positive side, the PEL finds that both the Twin Lakes and Salmon Creek alternatives meet the stated Purpose and Need for the second crossing and are less expensive than any of the Sunny Point or Vanderbilt alternatives.

The Salmon Creek and Twin Lakes options are also the alternatives that meet the Army Corps of Engineers, ADOT/FHA Federal 4(f), and ADF&G Refuge Management Plan legal requirements of avoiding a crossing in the Refuge if there is a feasible off-refuge alternative and, if there is no off-refuge alternative, minimizing impacts to the Refuge resources and uses. Salmon Creek is the only remaining off-Refuge alternative among those proposed, and among the others Twin Lakes is clearly the on-Refuge route that minimizes the impacts to Refuge resources and uses, meets the Purpose and Need for the project, and is the least costly.

We appreciate that DOWL and DOT have included the actual time savings of the different alternatives. The fact that the time savings are small increments of a minute or two between options is important for the public to be able to gauge the relative costs and benefits. It will let the public see that eliminating Sunny Point and Vanderbilt options will not create large differences in time savings, and will have greater benefits in alleviating pressure on the existing bridge and providing faster access to emergency services at the hospital for Douglas and West Juneau residents than the eliminated alternatives.

Incorporation of PEL by Reference in NEPA

Given the shortcomings described below, the consistently poor quality of PEL products, and the non-transparent and unresponsive process, this PEL report as a whole is not appropriate for incorporation by reference in NEPA. The purpose and need and alternatives screening could be used in NEPA if the improvements we suggest are made, but the environmental setting section, and the scope and level of detail of impact analysis are not close to being sufficient for incorporation in NEPA.

We hope that the issues and concerns that the MWSG has identified during this process over the past three years are considered by CBJ and DOT/PF in the selection of a contractor to develop the EIS.

Section 2 - Problems Needing Attention

Recommended Improvements to PEL

Many of the issues identified by Technical Advisory participants in relation to scoring the various alternatives have been seemingly ignored or dismissed without explanation. Here are some examples:

- Insufficient range in the scoring rubric to effectively differentiate impacts between alternatives. For most criteria, the scoring range is 0 to 2 or 0 to -2. The narrow range in scoring tends to mask or obscure differences between alternatives. For example, the PEL defines a zero rating to be “no impact”, yet it gives this rating to routes with substantial impacts in a poorly informed attempt to differentiate relative impacts with the limited scale.
- Lack of clarity and transparency on how criteria were scored and weighted, particularly the new “refuge impact weighting” scheme;
- Insufficient attention to impacts on the Douglas Island side, with an admitted but unexplained and unjustified focus on mainland impacts, neglecting Douglas Island features;
- No appropriate consideration of the impacts from habitat fragmentation;
- Insufficient consideration of hydrological impacts of the structures;
- Not using best-available data, e.g., recent SEAL Trust habitat mapping or wetland assessment, and recent identification by ADF&G of anadromous water bodies;
- Not using available bird datasets effectively (e.g., eBird, Hotspots);
- Failure to rate impact to the key intertidal resources, particularly salt marsh, but also mudflats, channels, and rockweed/mussel beds;
- Inadequate consideration of the impacts on recreation, especially waterfowl hunting; and
- Failure to include environmental and Refuge protection goals that are required by regulation and important to the community as primary rather than “additional.”

New mistakes have also crept into the PEL scores and reporting, some due to the unexplained refuge weighting scheme and problems with DOWL’s wetland delineation and functional assessment. While highlighting refuge impact is important, your method appears to be arbitrary and unjustified in some cases (see Table 1). For bird habitat, only Refuge acres are tallied, in effect removing important off-refuge resource impacts from consideration. Yet even for bird habitat, when the off-refuge footprint is large, the effect of the supposed “refuge weighting” is to “unweight” refuge impacts.

Table 1. Environmental score summary with selected errors and inconsistencies highlighted.

Resource Affected	Mend Pen		Sunny W		Sunny E		Vanderbilt		Twin L		Salmon	
	score	extent	score	extent	score	extent	score	extent	score	extent	score	extent
Wetlands (refuge-weighted score, acres)	-1	17.9	-2	21.5	-2	9.6	-2	28.7	-2	32.9	0	2.8
High value wetlands (refuge-weighted score, acres)	0	3.4	-2	20.9	-2	8.9	-2	6.5	-2	30.5	0	2.8
Intertidal zone (refuge-weighted score, acres)	0	14.1	-2	10.8	-2	12	-2	31.9	-2	38.2	0	2.9
Stream and riparian habitats (refuge-weighted, linear feet)	0	436	-2	1167	-1	1007	-2	2621	0	0	0	0
Wildlife habitat (refuge-weighted score, acres)	-1	56.8	-2	32.8	-2	14.7	-2	37.5	-2	36	0	3.6
Anadromous streams impacted (number of streams)	0	1	-2	14	-1	4	-1	3	0	0	0	0
Important migratory bird habitat (refuge-weighted, acres in MWSGR)	0	9.2	-2	14	-2	7.9	-2	8.4	-2	18.6	0	0
Section 4(f)/6(f) resources affected (number of properties)	-2	3	-2	2	-2	2	-2	2	-1	1	0	0
Protected lands (acres)	-1	9.2	-2	18.2	-2	13.8	-2	8.4	-2	18.6	0	0
Impervious surfaces (refuge-weighted, acres)	-1	64.2	-2	38	-2	15.2	-2	42	-2	42.2	0	3.3

The most striking errors are for the Mendenhall Peninsula (MP) alternative in the revised ratings. This may seem moot since this alternative is dismissed because of costs, but the ratings should reflect the impacts on extensive affected waterfowl, shorebird, anadromous stream, and intertidal/wetland habitat that is largely within the Refuge. Habitats in the area impacted by this option are by some measures the most important on the Refuge, and off-refuge impacts would also be extensive. The scoring errors appear to be largely due to problems with the new “refuge weighting” scheme, which seems based on the proportion, rather than the actual amount, of total footprint area within the Refuge. Faulty stream counts and errors in wetland mapping and assessment also contributed to the inappropriate MP rating.

We also note that the draft PEL report fails to clearly map, share with the public or advisory groups, or consider impacts of the Douglas Island side “roundabouts” that appear in site narratives. Additional properties would be affected and additional impacts would result but are not described or rated, and it is not clear how topography or other considerations such as wetlands, streams, and drainages would affect these “roundabout designs.” Also, the report map inexplicably no longer shows the full Vanderbilt alternative footprint.

Uses of PEL for an EIS - Relevant Agency Conditions

Page 115 of the PEL report (Table 18, Relevant Agency Conditions per 23 U.S.C 168) lays out the conditions for adoption of the PEL study results into a subsequent NEPA review. To be adequate for this purpose significant improvements are needed in order to meet the following conditions.

Condition 2, Agency Consultation. Involvement of Alaska Dept. of Fish and Game

An example of what we would consider fulfillment of the Agency Consultation requirement is as we have noted above, and in previous comments, that the Alaska Department of Fish and Game (ADF&G) be more meaningfully involved in the analysis of impacts of at least those crossings inside the MWSGR. The footprints of all but one of the second crossing alternatives evaluated

in the PEL process would be located on the Refuge. If federal National Transportation Act funding is requested for design and construction of a second crossing on the refuge, Section 4(f) of the 1966 National Transportation Act mandates that “the Secretary shall not approve any program or project which requires use of any land from a . . . wildlife and waterfowl refuge . . . unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such . . . wildlife and waterfowl refuge . . . resulting from such use.” The legally adopted management plan for the Refuge and the memorandum of understanding (MOU) between the Federal Highway Administration (FHA) and Alaska Department of Transportation and Public Facilities (ADOT&PF) essentially mirror these Section 4(f) requirements.

Overall, the PEL report fails to acknowledge the key consulting and decision-making role of ADF&G in any action regarding the Refuge as well as fish and wildlife, their habitat, and related issues of access and human use. As the agency of jurisdiction, ADF&G has the unique status under state and federal law to ensure that Section 4(f) is adhered to with respect to the MWSGR. This key role is the sole responsibility of the ADF&G Commissioner and cannot be relegated to any other agency be it federal, state, or local government. This responsibility needs to be met in both the PEL process and any subsequent Environmental Impact Statement (EIS) prepared pursuant to the National Environmental Policy Act (NEPA) regarding a second crossing alternative which partially or wholly crosses MWSGR land. The final PEL report needs to make the above requirements abundantly clear.

Moreover, as we have suggested, it is essential that the final PEL report have meaningful ADF&G involvement in describing the adverse environmental impacts anticipated for each refuge-crossing alternative. This information is needed for decision makers to assess which alternatives are likely to result in the least adverse impact to Refuge values. The information is also needed to anticipate how to avoid or otherwise mitigate adverse impacts resulting from any particular crossing alternative.

Public use of the Refuge will also be impacted by any of the refuge-crossing alternatives. Waterfowl hunting is an example we have repeatedly emphasized. It is likely that discharge of firearms directly adjacent to a bridge will be unlawful, and this calls for discussion by ADF&G in the PEL report, with acknowledgement that hunters may lose access and use of a large portion of their key waterfowl hunting area.

Condition 3. (systems level and corridor-wide effects analysis)

The PEL analysis lacks systems level and corridor-wide effects analysis of resource and human use impacts. For example, impacts to salt marsh or other habitat types were not specified despite previous recommendations, hindering the ability to assess and compare impacts to ecosystem productivity or other functions. While a spatially limited and poorly applied wetland assessment was done by the PEL contractor, the results were questionable.

Effects analyses were not corridor-wide in some cases. Off-refuge bird habitat was apparently not assessed in the revised analysis since “important bird habitat” was re-defined as being only within the Refuge. Impacts on the Douglas Island side of the channel were omitted from analyses in some cases; examples are the failure to include anadromous streams (9 Mile access, 5 Mile access) or some of the wetland acreage on the Douglas side (Hendrickson Point and 9 Mile access), or to account for the footprint of the North Douglas Highway roundabouts mentioned in the draft PEL report but not included in designs or maps.

Transportation analysis also lacked a systems-wide and corridor-wide approach, similarly neglecting the impacts from changed travel routes on the already stressed North Douglas Highway corridor and omitting effects of the roundabouts noted in the PEL report.

Condition 7. (rational use of reliable and reasonably current data, reasonable and scientifically acceptable methodology)

Our previous comments <https://heartofjuneau.org/wp-content/uploads/2024/08/MWSG-Comments-on-PEL-Level-2-screening-results.pdf> document numerous areas where the PEL does not use reliable data or reasonable and scientifically acceptable methodology. We have pointed out many such issues along the way, including wetland mapping errors; misrepresentation of existing bird data; failure to use existing or new anadromous stream mapping, updated and detailed habitat mapping, or credible wetland functional assessment; lack of transparent, reasonable, and consistent ratings (narrow score range, opaque and canted “refuge weighting” and wetland scores, and under-estimating MP alternative effects when it crosses the Refuge and has the greatest impact on the most vulnerable refuge resources).

There is no tally of salt marsh affected or mention of wetland or habitat impacts beyond the fill or decking footprint. Non-tidal vs tidal wetlands are not differentiated in the scores. And most importantly, the PEL does not use its scores logically, and as intended, to screen and remove from further consideration the lower-scoring alternatives at the center of the Refuge that have significant environmental and regulatory constraints.

Condition 8. (sufficient supporting detail for conclusions and NEPA)

The PEL report lacks sufficient detail to support its inclusion in NEPA. Documentation of need, rating methods, and results are sketchy and uneven. For example, the score summary table at the top of the Level 2 rating appendix unaccountably does not include Salmon Creek, the highest scoring alternative and one that is the best by many measures. The scoring methods for birds, wetlands, intertidal and other habitat, and impervious surfaces are not fully explained; the “weighting” method for refuge impacts for these is unclear. The definitions used for wetlands and high value wetlands in the ratings and in different parts of the report are also not clear.

The PEL maps are in many cases misleading. While detailed habitat maps and good low tide imagery and lidar-based low tide elevation models are available, these are not presented in context of the entire project area or the crossing sites. The aerial photographs cut off the tidelands of the MP alternative crossing. Overall project area maps shared with the public, including those in the PEL introduction, represent tidelands as open water.

Relying on undisclosed “mitigation” options that according to project proponents improve the Sunny Point or Vanderbilt alternatives such that they should be included, or even preferred, in subsequent analyses, violates the requirement of a transparent and public PEL process and the logic of the screening method. It is also out of step with the state and federal regulatory requirement to first avoid and reduce impacts before resorting to compensatory mitigation for unavoidable impacts.

Condition 9. (appropriate for incorporation in NEPA)

Given the above shortcomings, the consistently poor quality of PEL products and the non-transparent and unresponsive process, this PEL report as a whole is not appropriate for incorporation in NEPA. The purpose and need and alternatives screening sections could be used in NEPA if the improvements we suggest are made, but the scope and level of detail of impact analysis and “environmental setting” is not close to sufficient for incorporation in NEPA.

Concurrence Points

In italics below are the six pending Concurrence Points needed for ADOT compliance with state and federal regulation, as listed in the PEL report on page 12. Some of the pending Concurrence Points overlap with NEPA-related conditions we have addressed above. Others refer specifically to public/agency involvement, impacts, mitigation, implementation steps, and the environmental setting description.

- *“Public and agency involvement is adequately documented.”*- NO

While public and agency involvement is documented through an archive of comments and meeting dates, the substance of meetings is not. Issues raised and proponents’ responses were

not adequately documented. In these meetings, there was a repeated pattern of agency and advisory group concerns and questions not being answered or addressed. The archive will illustrate the many instances where the contractor and proponent agencies thwarted meaningful public and agency involvement rather than showing that “involvement is adequately documented.”

- *“The ten conditions identified in 23 U.S.C 168 have been followed”* – NO
- *“Planning products & analyses are adequate for incorporation into future NEPA processes”* – NO

We have addressed these concurrence points relating to alternatives analysis with respect to NEPA above under 23 U.S.C 168 Conditions 2, 3, 7, 8, 9 and elsewhere in this document. Due to problems with process, methodology, data, and reporting, it does not appear that the PEL products in their current form meet standards for adoption by reference or incorporation into a NEPA review.

- *“Impacts and mitigation are appropriately documented”* – NO

As we have noted elsewhere in this document, the revised impact rating is much improved but still contains many errors and weaknesses. While adequate for screening out the most damaging routes in a relative way, the revised ratings do not yet accurately identify or document impacts of all crossing alternatives and are not appropriately supported by accurate maps and tables. Mitigation does not appear at all in the PEL planning products, although some design elements such as piling are important in reducing impacts in comparison to other possible types of crossing designs.

- *“The basic description of the environmental setting is adequate”* – NO

While there are some improvements in the summary environmental setting chapter of the PEL report, the original “setting” document (Appendix 6) has been attached to the PEL in its uncorrected form and neither are fit for adoption into NEPA due an unacceptable level of factual errors and omissions regarding both regulation and resources. The documents’ description of the ACOE regulatory process and guidelines for wetlands and waters is incomplete, lacking Section 10 reference, “Special Aquatic Site” criteria for refuges and mudflats, or an accurate and coherent description of wetland types and ACOE jurisdiction across tidal elevations. The more extensive wetland mapping for the City and Borough of Juneau 2016 wetland plan update and SEALT 2003 wetland mapping was not included in the maps and wetland calculations. The extent and importance of salt marsh is not mentioned in the wetland section. Low and high tidal marsh and other important tidal habitat was not described or spatially summarized.

The report's statement that the Douglas Island and Mendenhall Peninsula areas have fewer wetlands is quite misleading, given the very large forested and open peatlands on the uplifted marine surfaces in that area. The report mentions West Douglas Island in that context, although it is not part of the project area. Development interest in that area and in the related bench road is mentioned in the project Purpose and Need but these extensive wetland areas and their appropriateness for housing or other development are not described or assessed in the PEL, another flaw in the overall process and project justification.

The descriptions of fish and wildlife are also rife with errors and omissions. Amphibian information appears outdated by approximately 20 years (lacking information on the collapse and partial recovery of local toad populations, a documented toad spawning location in the refuge west of the Mendenhall River, as well as the presence and recent expansion of Columbia Spotted Frog in the Mendenhall Valley). The summary chapter does mention the Important Bird Area status of the Mendenhall Wetlands but does not adequately characterize seasonal use by waterfowl and shorebirds, failing to use the available data for specific crossing areas, to describe its magnitude and importance for key stewardship species or species groups, or to reference species of conservation concern in the Alaska Shorebird Plan or the state's comprehensive wildlife plan. Instead, Appendix 6 quotes outdated information on seabird colonies on the refuge (those having long ago moved to the Mendenhall Glacier and Lake edge).

Fish species habitat use information is incorrect in both documents, and both fail to note the importance of different parts of the Refuge and its resources for hunting, birding, fishing, and other recreation. While the summary report notes the presence of refuge access points and trails in its 4(f) properties summary, it does not list or depict these or use them appropriately in the ratings process. Several of these trails would be filled or otherwise affected by the proposed bridge abutments, but they are not mapped and their locations are not noted.

- *“The implementation plan contains reasonable steps for the project to move forward into the NEPA process”* – NO

The implementation steps section, as we have noted above, lacks appropriate description of the role of ADF&G in any decision related to refuge lands, uses, or resources. It also side-steps the primary regulatory requirement for avoidance of refuge, stream, and wetland impacts, or the additional steps of reduction and mitigation of unavoidable impacts. We note that the PEL's considered alternatives were all located on productive deltas, streams, and refuge access points, so the overall process cannot as yet be considered avoiding or reducing impacts in a fashion adequate for NEPA or for ACOE and T16 permitting until crossing sites are appropriately adjusted or additional routes are analyzed.

- *“The planning products are documented in such a form to be easily identifiable and available for review during the NEPA scoping process and can be appended to or referenced into a NEPA document.” –NO*

The maps, GIS map layers, tables, memos, report, and appendices are not consistently identified or packaged for NEPA. Some maps are grossly inaccurate or misleading and some of the report Appendices do not include their referenced maps, figures, and ancillary data. Some data layers are not provided in the project GIS or in maps. For example there is no consistent map of “wetland” or “high value wetland” acreage by site or the definition of these. Only assessment areas are mapped, but not in the online GIS. Wetland delineation and assessment maps and tables have too many inaccuracies to be useful and their tables do not summarize acreages in a way that supports ratings. The online GIS of wetland classification/delineation has no key. There are no site-focused maps in the report illustrating or summarizing resources or impacts at each site.

Section 3 - Factual errors in PEL Study Draft

In addition to the problems noted above, the following factual errors should be corrected in the final PEL Report:

- The waterfowl hunting season regulations cited on Page 45 of the draft are incorrect, being relics of the early years of the PEL effort. The current regulations for the region extend from Sept. 1 - Dec. 31 with a closure from Dec. 1-15. However, with a Board of Game meeting considering these regulations again in early 2026 it might be better to describe the seasons in a more general way and refer to the regular state and federal season-setting process.
- On Page 67 of the draft the list of mammals should be corrected by changing “otter” to “river otter.”
- The draft incorrectly states on Page 44 that Southeast Alaska Land Trust parcels exist “within the refuge.” SEALT parcels in the PEL study area lie within the Mendenhall Wetlands but have been acquired precisely because they are accreted parcels which lie outside, but adjacent, to the MWSGR.
- Wetland information is inaccurate. For example, freshwater wetlands were missed on Hendrickson Point and Mendenhall Peninsula. Tidal wetland types were mis-classified in the areas off Hendrickson Point (mapped an above Mean High Water bar regularly flooded) and on both sides of the Mendenhall Peninsula crossing (failed to map high marsh on the mainland side and low marsh on the Douglas side). A typo in a wetland summary table identifies the salt marsh inboard of Vanderbilt as non-tidal. The screening criteria section in

Appendix 8 shows only “wetlands”, not both “wetlands” and “high-value wetlands”; the definitions or thresholds for these are not described.

- There are numerous errors and confusions in the text of the PEL wetland survey report in Appendix 12. In some parts of the report, estuarine wetlands are not counted as wetlands but instead as waterbodies, while in other parts of the document they are counted as wetlands. Intertidal areas are in some places described as subtidal. Definitions are confused, at times indicating that only freshwater wetlands are “wetlands”, which is not the case. Appendix 12 of the PEL report does not include the actual delineation maps or associated documentation that are in the original wetland report.
- The PEL report fails to fully describe ACOE 404 and section 10 jurisdictional authorities,, including the ACOE 404 definition of refuges, wetlands, streams (pool/riffle complexes) and mudflats as “special aquatic sites” that have requirements for impact avoidance similar to those of 4f and the refuge management plan.
- In the section on Essential Fish Habitat, the text descriptions are not consistent with the tables presented.
- Erroneous anadromous stream descriptions or counts at several crossings, including some recently surveyed by ADF&G – at the 9 mile access trail, 5 mile Ck, and Falls Ck.
- Erroneous trail counts and maps– some of the refuge access trails were not counted, including the 9 mile refuge access trail and 5 mile N Douglas refuge access trail.
- The score summary at the top of the Level 2 screening detail does not include Salmon Creek.
- The PEL report map for Vanderbilt shows a much smaller footprint than the project GIS and previous maps; it appears to lack the proposed additional lanes and does not match the impact calculations.

In Conclusion

The Mendenhall Wetlands Study Group appreciates the opportunity to comment once more on this protracted and complicated PEL process. Our hope is that our considerable investment of time, expertise, and attention will be similarly valued and used to help clarify the choices ahead. We believe that our community, and the state, deserve and expect efficient and rational planning for our precious and limited public resources, both financial and environmental.