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**Subject:** SEALT Comments for 3/2 Public Worksession on Juneau North Douglas Crossing Project  
**Date:** Thursday, March 2, 2023 2:31:29 PM  
**Attachments:** [2023-02-28 SEALT Statement on Second Crossing.pdf](#)

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### **To the Public Works and Facilities Committee:**

The Southeast Alaska Land Trust (SEALT) appreciates this opportunity to provide feedback regarding the Juneau-Douglas North Crossing project and Planning and Environmental Linkages (PEL) study. SEALT will submit brief in-person comments at the March 2, 2023 public worksession, and provides this letter and attached statement as a detailed supplement.

SEALT owns and stewards 22 conservation properties immediately adjacent to the Mendenhall Refuge State Game Refuge (Refuge) and several of the preliminary alternatives considered by the PEL study cross directly through these conservation properties. The majority of these properties were acquired as mitigation sites to provide compensatory mitigation for Refuge wetlands lost during the Juneau airport's expansion in 2009.

While SEALT does not oppose the establishment of a second crossing, the habitat and recreation values of the Refuge, as well as the necessity of avoiding SEALT's wetland mitigation sites, should eliminate from consideration all crossing locations within the Refuge's boundaries.

Please find attached SEALT's public statement regarding this project, which outlines our interest and role as a stakeholder. Additionally, we have summarized below the comments we previously provided to the PEL Study.

### **Mitigation Sites for the Juneau Airport**

SEALT is an approved mitigation sponsor with the U.S. Army Corps of Engineers (USACE) and has operated an in-lieu-fee program in Southeast Alaska since 1998, providing compensatory mitigation services to developers seeking permits for projects that result in a loss of aquatic resource functions. SEALT's mitigation services are provided through voluntary transactions with willing landowners.

In 2009, SEALT provided wetland mitigation credits to the City and Borough of Juneau to compensate for the loss of aquatic resource functions resulting from the Juneau International Airport expansion into the Refuge. This required compensatory mitigation was outlined in the 2009 Department of the Army permit POA-1981-320-M22 and 2007 Juneau International Airport Final EIS and Section 4(f) Evaluation.

Since 2009, SEALT has used the in-lieu fee generated by the Juneau Airport expansion project to acquire private parcels adjacent to the Refuge as wetland mitigation sites. The SEALT mitigation sites around the Refuge were chosen for the Juneau Airport expansion's impacts specifically because they were the most appropriate in-kind mitigation, as their proximity and function matched the impacted aquatic resources.

Impacts to these mitigation sites would irreparably harm the Mendenhall Wetlands ecosystem and

negate the in-kind compensatory mitigation completed for the Juneau Airport expansion. There are very few properties adjacent to the Refuge that would match the aquatic resource functions of the existing mitigation sites. For this reason, impacts to SEALT's mitigation sites would be nearly impossible to adequately mitigate.

### **Fragmentation Concerns**

Building a crossing within the boundaries of the Refuge would likely effectively create two Refuges by fragmenting the habitat, viewshed, hydrodynamics, recreation opportunities, and other services and functions provided by the Refuge. Examples of the impacts of fragmentation include:

*Refuge Users:* A second crossing through the Refuge would irreversibly change the ability of recreational and subsistence users to use the area, including the likely prohibition of waterfowl hunting (a key reason for the Refuge's establishment) and the loss or restriction of access from established public access points.

*Hydrodynamics:* The hydrodynamic connectivity of the Refuge is essential to its continued function as an estuary and wetland preserve. The wetlands of Gastineau Channel are supported by both freshwater inputs and tidal flows from both ends of the channel. The location and method of crossing construction will significantly impact on the area's hydrodynamic connectivity and continued functionality as a globally significant estuarine wetland.

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*Viewshed:* The view across the Mendenhall Wetlands is iconic – after the glacier view, it is the second most important viewshed in the community and was identified as a scenic corridor/viewshed by CBJ's 2008 Comprehensive Plan. This viewshed should be preserved in addition to its rare, unique, and irreplaceable environmental values.

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*Noise:* Establishing a crossing through the Refuge would alter the soundscape, impacting residential communities, wildlife, hunters, and recreational users of the Refuge.

### **Conclusion**

The Southeast Alaska Land Trust cannot support the PEL Study's preliminary alternatives that impact SEALT mitigation sites and/or the Mendenhall Wetlands State Game Refuge, including: "North Airport", "Sunny Point Area A", "Sunny Point Area B", and "Vanderbilt". These alternatives should be removed from consideration.

SEALT encourages the PEL Study to focus on preliminary alternatives that do not impact the Refuge, including: "Salmon Creek", "Eagle Creek", and "Downtown".

With careful study and design, the "Mendenhall Peninsula" alternative could be located and constructed in a way that would not impact mitigation sites or the Refuge.

While SEALT welcomes necessary development for the community of Juneau, the Refuge and our adjoining conservation properties are not suitable locations for a Juneau-Douglas North Crossing.

Thank you for taking the time to review our comments. We will continue to participate as a member

of the PEL Study's Technical Advisory Committee, and are available to answer questions and collaborate on how to achieve the best possible alternative.

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