

## **Juneau-Douglas North Crossing - Concerns about Process & Expert Review**

The current PEL (Planning and Environmental Linkages) Study process for the Juneau Douglas North Crossing has suffered from a lack of transparency, unreliable communications concerning screening results, short comment periods, and poor, incomplete response to concerns. The process seems oriented to achieve a predetermined result, regardless of objections and concerns raised by technical reviewers and key stakeholders. From the beginning, the PEL Study Team led by DOWL has ignored or profoundly underestimated the values inherent to the wetlands. **The Mendenhall Wetlands:**

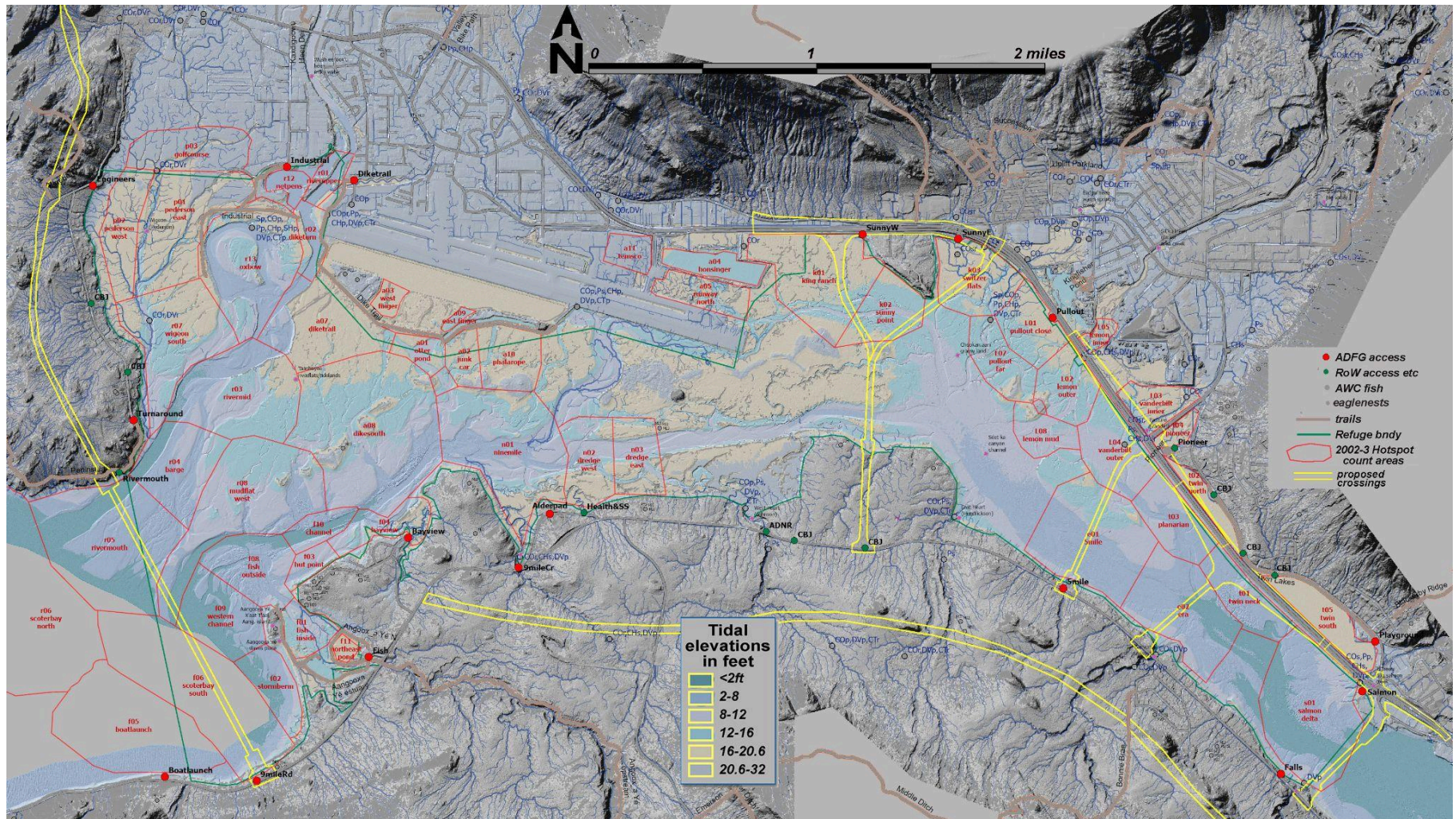
- Are designated as a Globally Important Bird Area (IBA) supporting at least 5% of the population of 34 species
- Include the Mendenhall Wetlands State Game Refuge, a 3,700-acre public preserve protected by law in 1976
- Along with the Mendenhall River and dozens of streams, they provide nursery/rearing habitat for fish, sustaining wild food access, recreational fishing for locals, and food for migratory birds, wildlife, and marine mammals
- Exemplify rare and highly significant salt marsh and tidelands supporting southeast Alaska's food web
- Support visitor industries such as whale-watching, wildlife viewing, and other scenic tours
- Are some of Juneau's most accessible and frequented public open spaces, which Juneau residents value for various uses: waterfowl hunting, bird watching, fly fishing, hiking, cultural and edible plant harvest, dog walking, etc.

We emphasize that habitat removed from the Mendenhall Wetlands cannot be duplicated. There are only three IBAs in Southeast Alaska; our wetlands connect a migratory bird corridor that supports millions of birds.

### **Outstanding concerns about the screening process and financial risks of a poorly planned second crossing:**

- **Alternatives dismissed without due process.** The PEL Study Team, guided by CBJ, is dismissing the Salmon Creek alternative without concurrence from regulatory agencies or advisory committees, on the grounds of a highly unlikely flood event. The PEL Study Team's scenario includes a confluence of catastrophic events, including an 8.0 earthquake in Chatham Strait, *and* a total simultaneous disappearance of the Salmon Creek dam, *and* AEL&P operating outside of their FERC license for the dam. CBJ's rationale to eliminate the Salmon Creek route seems less than authentic when CBJ expresses no urgency to address risks to the existing highway and infrastructure at Salmon Creek – the actual casualties of this improbable scenario.
- **Faulty analysis.** DOWL's work products throughout the screening process have been poor quality, flagged by both regulators and stakeholders for factual errors, unsupported conclusions, and deviations from the process.
- **Construction expenses.** The PEL Study Team favors longer alternatives (Sunny Point, Vanderbilt) over shorter ones (Salmon Creek, Twin Lakes). A bridge will have to be elevated to accommodate tidal flows that nourish the wetlands, and construction costs will be high and escalate the farther west a crossing is located.
- **Maintenance expenses.** Even the shortest of the crossings adds a significant maintenance burden to an already stretched ADOT&PF budget. CBJ has no plans to take on the cost of plowing, re-paving, structural upkeep, etc. If a second crossing is desired by a community facing population decline, budget deficits, school closures, and an affordable housing crisis, it must be planned comprehensively with healthy scrutiny of the costs vs benefits.

Juneau residents live here in large part for proximity to the natural world, and the Mendenhall Wetlands are a vital example of what makes Southeast Alaska such an incredible place to live, work, and visit. Although a second crossing might fulfill some important goals, it should be located so that it does not jeopardize ecological and community values that cannot be replaced elsewhere. To build a second crossing directly in beloved open space, at the cost of rare and important migratory bird and fish habitat - eliminating accessible hunting and recreation for many locals - would irrevocably alter the character of Juneau and Southeast Alaska. **We urge a comprehensive cost-benefit analysis and consideration of alternative routes outside of the Mendenhall Wetlands.**



Map: JDNC PEL Study Alternative Crossing Locations relative to the Mendenhall Wetlands State Game Refuge, municipal parks, state recreation areas, Juneau International Airport, fish streams, bird hotspot survey areas, hiking trails, and access points for hunting & fishing

We support a process that uses the best available science to identify the second crossing alternative that has the least negative impact on humans, natural resources, and the habitat values of the Mendenhall Wetlands State Game Refuge.