

**NORTH DOUGLAS NEIGHBORHOOD ASSOCIATION**  
**P.O. Box 240303, Douglas Alaska 99824**  
**[www.northdouglasneighborhoodassociation.com](http://www.northdouglasneighborhoodassociation.com)**

August 8, 2024

City and Borough of Juneau Assembly  
155 Heritage Way  
Juneau, Alaska 99801

Re: PEL Process

Dear Mayor Weldon and Assembly Members:

The North Douglas Neighborhood Association (NDNA), through its Second Crossing Committee, has actively participated in the processes for developing a second crossing from the Juneau mainland to North Douglas Island, including during the round of review in 2005-07 and more recently, in relation to the Planning and Environmental Linkages (PEL) Study being conducted by DOWL pursuant to an agreement between the CBJ and the Alaska Department of Transportation and Public Facilities (DOT). Our primary interest in these processes has been to ensure that the impacts to our neighborhood are fully understood and evaluated, and as best as possible, avoided, minimized, and mitigated. Our concerns regarding a second crossing are best reflected in written comments and correspondence (including to the Assembly) that are posted on the NDNA website noted above. We invite you to review these documents.

NDNA has emphasized in all of its comments regarding a second crossing, including in the PEL process, that it does not take a position on whether a crossing should be constructed and if so, which of the alternatives is preferable. This neutral stance is consistent with the diversity of views about a crossing among residents and property owners on North Douglas. We have engaged responsibly, with a clear expectation that the process for identifying crossing alternatives would be both transparent and credible.

We are therefore alarmed by recent efforts to eliminate the Salmon Creek alternative from the suite of options under consideration. The rationale for this move is reflected in a draft memo from DOWL to DOT, dated June 27, 2024, which proposes to exclude the Salmon Creek alternative from further review and analysis under NEPA. The ostensible premise is that this alternative fails to “guarantee transportation infrastructure resiliency” in the event of a catastrophic failure of the Salmon Creek dam. We believe that the reasoning and analysis leading to this conclusion are incomplete, highly flawed, and ignore the many positive aspects of this alternative that have been identified in both the Level I and Level II screening results in the PEL study to date. We are concerned that the real motivation for this move to exclude Salmon Creek is to dismiss a crossing option that is outside the Mendenhall Wetlands State Game

Refuge (MWSGR) and which, because of that, implicates section 4(f) of the Department of Transportation Act of 1966. That statute prohibits using protected land for a transportation project unless two conditions are satisfied: (1) there is no prudent and feasible alternatives that would avoid use of the section 4(f) resource, and (2) the project includes all possible planning to minimize harm to that property. Under these standards, Salmon Creek would have to be considered as a crossing alternative in a subsequent NEPA process and comprehensive engineering analysis. A last-minute revision of the Level I analysis to exclude this alternative – which is what the DOWL memo proposes to do – would arguably circumvent operation of section 4(f) and facilitate selection of a crossing that bisects the MWSGR.

The PEL study is only a preliminary phase of a crossing project. It would be premature at this point to conclude that Salmon Creek is not a prudent and feasible alternative. The issue presented in the DOWL memo can and will be fully vetted during an ensuing NEPA review, with a thorough engineering analysis and risk assessment, and taking into account the views of the many agencies, both state and federal, that would have to be consulted. Accordingly, we call on the Assembly to oppose any move to eliminate Salmon Creek from consideration of possible crossing locations at this point in the process. We also ask that you shed light on the involvement of CBJ staff in supporting DOWL's recommendation. The discussions among the PEL study team and CBJ staff have not been open to the public. It is imperative, in the interests of transparency, that the Assembly clarify the extent to which you are informed of staff's support for eliminating the Salmon Creek alternative and whether the Assembly has approved those efforts.

Thank you for considering this letter. Representatives of NDNA are prepared to appear before the Assembly at future meetings, to discuss these concerns and answer any questions you may have about our reaction to this belated effort to revise the PEL study.



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Mike Stanley, Chair  
NDNA Second Crossing Committee



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Ellen Ferguson, President  
North Douglas Neighborhood Association

Endorsing NDNA Board and Committee Members: Julie Bednarski, Danielle Farrell-Brown, Wayne Carnes, Merry Ellefson, Fred Hiltner, Matt Kern, Doug Mertz, Jack Poulson, Kristie Swanson Poulson, Karen Pallenberg, Philip Pallenberg, Jim Powell