



March 15, 2024

Re: PEL Level 2 Draft Scoring

Dear Ms. McCammon and DOWL Juneau-Douglas North Crossing PEL Team,

Given the simplicity of the current PEL Level 2 scoring system and the need for more robust data collection and assessment with best available data, we do not believe that any of the current alternatives, including the only remaining off-refuge alternative at Salmon Creek, should be excluded from a future NEPA process based on their relative Level 2 scores.

We offer a few suggestions for improving the scoring so the public, agencies, and Advisory Committees can transparently compare the benefits and impacts of different options. However, even if these recommendations could be fully realized with existing data, because more robust data collection is needed, all alternatives should still be retained going forward (unless fatal flaws are uncovered - e.g. interference with airport, inability to get Coast Guard approval, geotechnical limitations).

Issue 1. Environmental Data Accuracy and Completeness for Impact Assessment

The underlying environmental data used throughout the PEL, including the Level 2 Scoring, is inadequate and/or not the best available in some cases (specific examples below). Concerns about the incorporation of the best available data and meaningful engagement with experts in creating and evaluating criteria have been expressed throughout the process by Southeast Alaska Watershed Coalition and other members of the stakeholder and technical advisory committees and have yet to be fully addressed.

Areas that should be revisited (at a minimum)

- Wetland Delineation: Incorporate the best delineations and wetland value/function. SEALT's recent wetland delineation is the most accurate and recent delineation available. This information was not used in this process, instead older and rapid assessments along with NWI continue to be used.
- Wetland Impact: Level 2 scoring only considers the number of acres affected, potentially discounting the true environmental impact. Including additional wetland data such as wetland type/value/function, would help provide a more accurate representation of the impacts. "High value wetlands" was included as a criterion in the Recommended Alternative Selection Criteria Memo (February 2023) for Level 2 Scoring yet were not included in the Level 2 Scoring.
- SEALT mitigation property impacts – ensure these are accurate.
- Essential Fish Habitat limits and application (per NOAA's comments during joint Advisory Committee meeting 3/7/24)
- Impacts to anadromous streams - The metric used in Level 2 only addresses the number of streams. While an important rough assessment of impacts to anadromous streams (i.e. Level 1 Scoring), it does not capture the value of anadromous streams (i.e. stream miles, quality of habitat, number of species, habitat type, run size). Additionally, what would impacts look like? Are the structures just in the vicinity of the streams? Would streams have to be re-routed? New culverts installed? These types of issues add a lot of nuance to the existing criteria and could help compare impacts in a much more meaningful way.
- Migratory bird habitat impacts – Level 2 Scoring uses the number of nests as a metric for assessing migratory bird habitat. This only takes into account one component of the lifecycle of



migratory birds and only includes species which nest in the areas impacted, excluding impacts to rearing, staging and overwintering. Integrating information from multiple sources would likely provide more nuance and a better picture of impacts (Armstrong et al 2004, ebird hotspots, local birding experts knowledge, ADF&G refuse managers). Would local bird experts agree with the relative impacts assessed by this scoring system?

Additionally, please make it clear when impacts are assumed to be within the footprint of the fill, the whole structure, or some proximate distance. Consult with experts to ensure these assumptions are reasonable (include justification in scoring) and that important qualitative differences in impacts across alternatives are incorporated in the scoring system.

Issue 2. Level 2 Score Weighting

With all questions weighted equally in the current scoring system, those topics with more questions are weighted more heavily in the overall score. This weight may or may not correlate with the value attached to different types of impacts. Additionally, criteria with scores ranging from -2 to 2 have 40% more weight than those with a range from 0 to -2, or 0 to 2.

We suggest separating criteria by benefit/impact type and calculating scores for each that can be compared across alternatives, and letting the public weigh in on what is most important to them. “Dealbreakers” may be hidden in an overall score if very low scores in one area are balanced by higher scores in another area that is less valued by the public.

Potential categories for consideration:

- PEL Needs (infrastructure resilience, emergency response, traffic congestion, etc.)
- North Douglas Connection
- Environmental impacts
- Safety (include airport, Coast Guard)
- Residential impacts
- Visual, cultural, scenic identity
- 4(h) impacts (as this is an additional regulatory issue on top of the environmental impacts themselves)
- Mitigation properties impacted (as this is an additional regulatory and cost issue on top of the environmental impacts themselves)
- Commercial impacts – (North Douglas Connection could be wrapped into this one, not just commercial properties)
- Social impacts (add recreation impacts)
- Cost
- Public support (which should be reassessed after people have more information about the benefits and impacts of the different alternatives)

Within topic areas, criteria should be weighted in some way to reflect relative impacts. For example, why are impacts to existing homes and neighborhoods weighted the same as vacant residential areas? All wetland areas are treated the same. Etc. This was noted in issue 1 specifically related to environmental criteria but is relevant to all of others.

Issue 3. Negative scoring on No Build Alternative, and zero scoring on impacts.

The current Level 2 Scoring results in the No Build Alternative scoring negatively for the Purpose and Need category. A no build alternative would keep things as they are/neutral (or is this score assuming



lots of growth?). Make clear why this is not a neutral effect. As noted above, these are the only criteria with a 5-point scale, and individually have the most weight in the scoring system.

In some cases, alternatives receive scores of zero for criteria where there are impacts, albeit smaller than the other alternatives. Any alternative with impacts should receive scores that are lower than the no-build. If the Low-Med-High scoring system seems insufficient to address differences among alternatives, consider shifting to a 5-point system for all criteria.

Need for additional public facing data/information

A publicly available online mapper with underlying spatial data and the footprints of the projects would be extremely helpful for people to gain a more holistic understanding of the impacts of the different alternatives. This was requested previously.

Clarify for each alternative what type of structure is being considered (assuming this will be with the level 2 report).

Please post the 2005 Draft EIS that was completed for the last round of planning with the other source documents on the project webpage. The summary document provided is short on important details.

Please share all comments submitted by members of the Advisory Committees and the public.

Sincerely,

Rebecca Bellmore

Science Director, Southeast Alaska Watershed Coalition

PEL Stakeholder Advisory Committee member