

**NORTH DOUGLAS NEIGHBORHOOD ASSOCIATION
SECOND CROSSING COMMITTEE**

**COMMENTS ON PEL STUDY
LEVEL I SCREENING RESULTS**

MARCH 20, 2023

The Second Crossing Committee of the North Douglas Neighborhood Association (NDNA) has reviewed the Level I Screening Results presented in a technical memorandum dated March 2, 2023, and also participated in the Technical and Stakeholder Advisory Committee meeting on March 6, 2023, and has the following comments on the screening results and issues that the PEL study team will be considering at Level II Screening.

The PEL study team has recommended that only five of the preliminary alternatives advance for further detailed development – West Sunny Point, East Sunny Point, Vanderbilt, Twin Lakes, and Salmon Creek. Consistent with our prior comments (and also with comments we made during the last round of second crossing review, in 2005-07), NDNA does not take a position on which of these alternatives is preferable or that best addresses our concerns about impacts to the North Douglas area and our neighborhood. But we want to make several points regarding how these alternatives should be evaluated.

1. We continue to believe that the decision whether to build a second crossing and, if so, where, would benefit from an area planning process for North Douglas. We have been asking for an area plan for over two decades, to be conducted within the framework of the CBJ Comprehensive Plan, and will continue to pursue that goal. An area planning process would not only address issues related to a second crossing, but would also consider impacts to North Douglas associated with other developments, including (but by no means limited to) the Eaglecrest gondola, expansion of the boat launch, potential commercial uses of the pioneer road, and further development around Fish Creek Park. We understand that a planning process is not within the scope of the PEL study, but it would make sense to retain all of the alternatives that passed Level I screening for possible review in such a process were it undertaken in the reasonably near future.

2. The overview of the Level II screening process identifies two main goals: to screen the remaining alternatives using a broad range of qualitative and quantitative criteria, and to compare and rank the detailed alternatives. Done right, this should provide a useful analysis, as it would allow the decision-makers (DOT and/or CBJ?) to evaluate which of the alternatives makes the most sense. Ranking would also provide the public a better understanding of the advantages and disadvantages of each alternative. And it would result in a suite of alternatives that could be considered in a subsequent NEPA process. It would thus be premature at this point to eliminate any of the current alternatives that have been advanced for further review.

3. The Salmon Creek alternative scored well on a number of the Level I screening criteria, and has the additional advantage of being the only remaining alternative outside the Mendenhall Wetlands State Game Refuge, which is a Section 4(f) property. The technical memorandum indicates that a thorough 4(f) review will be conducted during the ensuing NEPA process (assuming the project proceeds to that phase), and it is therefore essential that the Salmon Creek alternative remains in the mix at the conclusion of the PEL study. The study team has preliminarily identified construction challenges for this alternative related to the Egan/Channel Drive intersection, but these are only generally described and are not the product of a rigorous and complete engineering analysis.

4. We reiterate a point we have made before: any alternative that proposes a transit corridor through the refuge must NOT include a substantial embankment/fill component, but should only be constructed as a raised structure, on pilings and abutments. The environmental impacts to the refuge from an embankment/fill structure will not pass scrutiny under 4(f) or other applicable standards.

5. In our comments on the preliminary alternatives, we commended the study team for including discussion of a bench road on North Douglas. While we understand that a bench road is not part of the PEL study, it would nevertheless be very useful if the remaining alternatives were evaluated based on their potential for connection to a bench road and the impacts to our neighborhood that would entail. In other words, the analysis should not be confined to assessing where and how crossing termini would intersect the North Douglas Highway, but should also consider the potential for connecting to an uphill bench road if one were built. The purpose and need statement emphasizes the goal of improving connectivity between the mainland and Douglas Island, and limiting the analysis to a brief description of where each alternative would land on the island side of the channel does not serve that purpose.

6. The stakeholder presentation described both Sunny Point alternatives as having the advantage of terminating on CBJ property (at Hendrickson Point), and in the case of the west alternative, a further advantage of avoiding SEAL Trust conservation property. But the CBJ property at Hendrickson Point is designated as a “conservation area” under the current CBJ Comprehensive Plan (2013). Conservation areas are “lands recognized with high environmental qualities that are set aside for the protection and management of the natural environment...” (CBJ Comprehensive Plan, at 144). Hendrickson Point is an ecologically sensitive area, with important upland habitat adjacent to the Mendenhall Refuge. It also provides a view shed for homes in the area. The PEL study team should consider the status and environmental values of the CBJ property at Hendrickson Point during Level II screening.

Thank you for considering these comments.