

# MEMORANDUM

CITY & BOROUGH OF JUNEAU

155 South Seward Street, Juneau, Alaska 99801

TO: Sam Kito, CBJ Project Manager

FROM: Teri Camery, CBJ Coastal Coordinator

RE: Juneau Second Crossing EIS Scoping Comments

DATE: December 1, 2003

Please forward the following comments to Mr. Van Sundberg at DOT.

The Juneau Coastal District has reviewed the Juneau Second Crossing documents for preliminary scoping comments regarding consistency with the Juneau Coastal Management Program (JCMP) and the Juneau Wetlands Management Plan (JWMP).

Below are the enforceable policies of the JCMP that apply to this project:

## **Coastal Development Section 49.70.905**

49.70.905(1) states:

*"To the extent feasible and prudent, coastal development shall be designed using best available technology to minimize hazards associated with physical conditions such as soil characteristics, slopes, geological features, surface and subsurface drainage, water tables, floodplains, and shore forms of the site."*

49.70.905(4) states:

*"Dredging and filling shall be prevented in highly productive tideflats and wetlands, subtidal areas important to shellfish, and water important to migration, spawning and rearing of salmon and other sportfish species, unless there is a significant public need for the project and there is no feasible and prudent alternative to meet the public need."*

49.70.904(12) states:

*"To the extent feasible and prudent, development shall not detract from the scenic qualities of the shorelines, shall be compatible with its surroundings, and shall not significantly block vistas."*

## **Section 49.70.930 Fish and seafood propagation**

49.70.930(a) states:



*“Shoreline use shall not adversely impact important fisheries habitat, migratory routes and harvest of significant fish or shellfish species. Shorelines having banks, beaches, and beds critical to the preservation or enhancement of the fisheries resource base shall be maintained in, or restored to, their original condition wherever and whenever feasible and prudent. Upland areas shall be managed to maintain water quality standards necessary for the propagation of anadromous fish species.”*

### **Habitat Section 49.70.950**

Section §49.70.950(a)(3) and (8), followed by (b) state that:

*“(a) Habitats in the coastal area which are subject to the Alaska Coastal Management Program include: (3) wetlands and tideflats and (8) important upland habitat; and (b) The habitats contained in subsection (a) of this section shall be managed so as to maintain or enhance the biological, physical and chemical characteristics of the habitat which contribute to its capacity to support living resources.”*

Section §49.70.950(c)(3) states:

*“(c)(3) Wetlands and tideflats shall be managed so as to assure adequate waterflow, nutrients, and oxygen levels, to avoid the adverse effects on natural drainage patterns, the destruction of important habitat, and the discharge of toxic substances.”*

With these policies in mind, we have the following comments:

**Anadromous Streams.** Approximately 20 catalogued salmon streams fall within the study area. Five of these streams are classified as impaired by the State Department of Environmental Conservation, including Jordan Creek, Duck Creek, Vanderbilt Creek, Lemon Creek, and Casa Del Sol Creek. Particular emphasis should be placed on evaluating potential impacts to salmon streams. The mouth of these streams is especially important as critical habitat for many fish and bird species. The effects of a bridge structure on the migratory routes of salmon also need to be considered.

**Tidal flows.** Bridge structures should be modeled in their potential locations for hydrological impacts. Specifically this should include effects on currents and tidal flow throughout the seasonal range of tidal conditions, for purposes of evaluating sediment transport and secondary effects on wetlands and streams.

**Secondary Impacts on West Douglas.** Because one of the purposes of the project is economic development of West Douglas, the assessment of secondary and cumulative impacts should include a literature review and identification of sensitive marine and upland habitats in West Douglas.

Thank you for the opportunity to comment.