



Southeast Alaska Conservation Council

2207 Jordan Ave
Juneau, AK 99801
(907) 586-6942
www.seacc.org

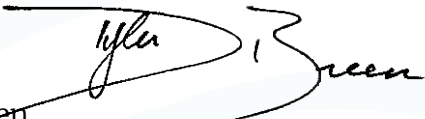
Dear Chair(s) and Members of the Transportation Committee,

Please accept the enclosed technical comment into public record regarding the proposed Cascade Point ferry terminal and associated infrastructure development in Berners Bay. The proposal raises significant concerns including project design, fiscal risks, permitting process timeline, and consistency with federal permitting requirements.

- **State fiscal exposure and federal match risk.** State plans use existing appropriations to meet the required state match for federal transportation grants, but Gov. Dunleavy's veto of those reappropriations leaves a shortfall in the match that threatens up to \$600 million in federal funding for Alaska projects that require a state contribution. Pushing Cascade Point forward wastes the current contracted \$28M and imperils future budgets with the expanding scope and cost of subsequent phases, further placing federal match at risk.
- **Permitting sequence and process integrity.** Key elements of the project are moving forward prior to a complete and transparent permitting analysis. Proceeding with site preparation or design-build contracting before resolving core federal and state permits places the State at risk of rework, delay, or litigation, with corresponding cost escalation.
- **Clean Water Act §404 and NEPA compliance.** The project requires authorization under §404 of the Clean Water Act, including NEPA components. Segmenting the project into discrete stages for separate permits, while advancing those stages toward an already identified full intended use of a mixed-use ferry and ore-dock operations, both undermines the required alternatives analysis and constitutes improper segmentation and weakens the legal footing of any §404 authorization by obscuring meaningful evaluation of practicable alternatives, as required by federal law.
- **Cultural and historic resource concerns.** The site lies within ancestral homelands of the Áak'w K̄wáan, which contain cultural resources, sacred sites, and burial areas. Analyses prepared for Goldbelt have been limited in scope and procedurally inadequate, failing to reflect early, good-faith government-to-government consultation as required under Section 106 of the National Historic Preservation Act, increasing the likelihood of conflict under cultural-resource laws and undermining trust with affected communities.

The Cascade Point project presents avoidable fiscal and legal risk to the State of Alaska. We urge the Committee to ensure that further legislative or budgetary actions adhere to regulatory requirements, fiscal prudence, and respectful engagement with affected Tribal governments and communities. Thank you for your consideration of these concerns and for your continued attention to responsible transportation planning.

Sincerely,



Tyler Breen
Policy Analyst
Southeast Alaska Conservation Council (SEACC)