

*A Joint Comment Letter From:*  
**Alaska Center for the Environment  
Turnagain Community Council**

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**RE: General Aviation Master Plan Draft Preferred Alternative and  
Draft Master Plan Chapter 4**

Dear Ms. Rigg,

Thank you for the opportunity to comment on the Lake Hood General Aviation Master Plan Draft Preferred Alternative and associated Draft Master Plan Chapter 4 — and for extending the comment deadline to assure the public had adequate time to provide a thorough review of this important and long-reaching document.

As community-based organizations representing a broad segment of Anchorage residents, Alaska Center for the Environment and Turnagain Community Council recognize that the airport provides economic benefits to the region, and that members of the community appreciate the convenience of having the Lake Hood General Aviation (GA) facility at the current location. The Master Planning process the Airport has undertaken provides an excellent opportunity to identify long-term needs of the general aviation community, but the Airport must balance those needs with other highly sought community values, such as quality of life, protection of established neighborhoods, and protection of wildlife and its habitat and natural open space buffers between incompatible land uses.

As part of this Master Plan, the Airport must acknowledge the negative impacts associated with its General Aviation operations — impacts like noise; degraded water quality; air pollution, and loss of wildlife habitat, wetlands, and natural open space buffering. These impacts result in a significant reduction in the quality of life for Anchorage residents, both in their homes and while recreating outdoors, and must be considered when evaluating the feasibility of the proposed projects in the Draft Preferred Alternative now out for public review.

**Chapter 4/Draft Preferred Alternative Comments and Recommendations —  
Provided in Document Chronological Order:**

#### 4.8.4 Status of Field Maintenance Complex

During the Master Plan Technical Advisory Committee meeting process, the question was asked more than once, “Why can’t the existing (old) Field Maintenance Facility be converted to GA use, as a new Field Maintenance Facility (FM) built a few years ago reduced the number of wheeled aircraft tie-down spaces at Charlie parking?” In Chapter 4, page 3, of the draft Master Plan document, an attempt is made to address this question by stating that essentially the new Field Maintenance Facility was never meant to replace the old facility and the old facility will be needed as the airport continues to expand. With all due respect, we highly recommend that the Airport refer to one of its own documents to set the record straight, as misinformation has been given to the public during this process. The reasoning stated above contradicts the “Field Maintenance Complex and Echo Parking Projects Draft Environmental Assessment (EA), July 2002, Volumes I and II. Under “Conclusions and Recommendations” (Vol. 2, page 11), it states, “The benefits of developing “Charlie” parking for FM as part of the AOA (Air Operations Areas) are numerous. The initial preference for FM is still valid and include:

1. The most direct access to the AOA
2. More efficient operations
3. The most direct access to commercial and Cargo Aprons
4. Lower cost
5. Shorter runway “turn” lanes
6. Safety of the public and FM workers
7. Security

**All of the reasons listed above** — most notably the last one — **are clearly discussed in the context of locating the entire FM complex to one site.** Under the EA’s “Site Selection Process and Criteria,” (page 6) it states, “Because security guidance for the industry continues to evolve for both regional and international airports, it is reasonable to presume that recent AOA access restrictions will be institutionalized. Additionally, FAA documents 150/5220-18 and DOT/FAA/AR-00-52 indicate that FM buildings and vehicles be on the AOA. The advantages of placing FM in a secure location are increased safety, security, and efficiency.

“Potential benefits of a FMF **wholly** (our emphasis) on “Charlie Parking” (Site 3) include a compact service area where current fire station, aircraft fueling, and security functions are already performed. Other benefits include convenient and controlled access to FM facilities by shift workers, vendors, and public visitors on occasion.”

Under the section “Security” (page 7), the EA states, “The FM has had problems with policing its quarters for years: vendors, curious members of the public, and thieves have all visited the existing FM buildings, with unfortunate results.” It goes on to state, “The significant concern is the recent threat increase to airports in general (September 11, 2001 New York Terrorist Attack). Specifically, the existing FM buildings are isolated and unable to become part of the AOA...Resolving the current security problem is now of the highest importance. Site 3 (“Charlie” parking) offers the best opportunity to affect real security increases for the FM Section, as well as improve a somewhat vulnerable area of the airport.”

On page 8, under “Site Size,” the EA states, “...feedback indicates that substantially less area is required to construct a facility large enough to accommodate FM needs into the foreseeable future...The conceptual design as developed for Site 3 included the ability to expand the work

bay by up to 100% within the limitations of the site...Overall, development costs, wetlands avoidance, and a projected decrease in FM activity near established neighborhoods make it more attractive than the other two sites.”

It goes on to state on page 10 under “Costs,” “In the case of Site 1 (the old FM site on Aircraft Drive), developing safe access to the AOA (unfunded) and controlling unauthorized access to the facilities are additional costs. However, Site 1’s long-term operational costs would persist: these include inefficient operations, transit time to the AOA, and fixing all non-code compliant buildings. Additionally, the current maintenance buildings will not accommodate the new snow removal equipment. **The costs of providing a secure facility may be incalculable.**” (our emphasis)

**CONCLUSION & RECOMMENDATION:** No one could read the above referenced document and come to any conclusion but the following: When the new Field Maintenance Facility project was proposed, major objectives included: 1) locate the entire facility in one location; 2) that it be a more secure location than where the old FM along Aircraft Drive is; and 3) that per FAA requirements, it be located on AOA, which the Aircraft Drive location is not. **This is what was communicated to the public at the time and the Airport should acknowledge that intent.**

Therefore, based on the above document, community council input, and input from members of the GA community during this Master Planning process, **we request that you include in the GA Master Plan Preferred Alternative the inclusion of the old Field Maintenance Facility for GA use (probably land for lease areas).** This area is already developed (i.e., wetlands already filled/natural vegetation already removed); is in close proximity to the GA area; and most importantly, it is located farther from the residential areas than the two proposed lease areas in the Draft Preferred Alternative, which would eliminate the need to locate lease lands in Turnagain Bog, closer to the residential areas of Turnagain.

#### **Table 4.8 Discarded Proposals**

**A. We specifically concur with the Airport’s decision to eliminate the following projects** from further consideration in the GA Master Plan Preferred Alternative:

- Closure of roads to the public and significant amount of perimeter fencing with electronic gate use limited to airport users
- Aviation use of Spenard Beach and Lions Club Picnic Area
- North runway extension (600’)
- Runway located as in Alternative D
- Designate lease land up to the boundary of Community (Note: It should be “Turnagain,” not Spenard)
- Trail along east perimeter of LHD
- New through road on east side of runway

**B. Use of Field Maintenance Facilities for GA. We reject the Airport’s reasoning** for discarding this project from further consideration — see extensive comments above.

**C. Permanently designate natural open space buffers. We do not agree with the Airport’s reason** for excluding from the Draft Preferred Alternative the community’s request to

permanently designate natural open space buffers in the GA Master Plan in North Turnagain Bog and East Turnagain Bog and again respectfully ask that the Airport look to their own documents and contractual obligations with the Municipality for consistency in land use designations. Stating that the “need to keep flexibility for unknown future aviation demand” as rationale for not designating buffer areas between incompatible land uses in a long-term Master Plan is poor planning. The Master Planning process is *the time* to identify long-term land uses and establish permanent buffers to protect the adjacent neighborhood — because of potential GA future growth, operations and impacts. The idea that future aviation demand may dictate that someday GA development and operations should occur right next to the Turnagain residential neighborhood should be outright rejected in this Master Plan and all future Master Plans.

The remaining Turnagain Bog and upland treed areas extending up to W. Northern Lights Boulevard, (i.e., North Turnagain Bog) and the Turnagain Bog and upland treed buffer between Aircraft Dr./Runway 13-31/Lakeshore Dr. and the Turnagain residential neighborhood (identified by the Corps of Engineers as “East Turnagain Bog”) should be designated as permanently protected natural open space buffer in the GA Master Plan Preferred Alternative. These undeveloped open space lands are of high value to this community in their current natural state. They help buffer Anchorage’s adjacent neighborhoods and recreational amenities from the noise, air pollution, water pollution, traffic, and visual industrial blight that result from the Airport’s operations. These areas provide important wildlife habitat and serve important community recreational and aesthetic functions. They provide essential buffering between incompatible land uses and help mitigate the negative impacts to the community from both the GA operations and the North Airpark cargo operations west of Turnagain Bog. In the future, as the Airport continues to grow, these buffers become increasingly more important to protect adjacent neighborhoods from impacts.

**The following documents reinforce our request that North and East Turnagain Bogs be designated as natural open space buffers by the Airport in the GA Master Plan Preferred Alternative:**

1. Historically, the Airport had the wisdom to follow this rationale. In the 1981 Anchorage International Airport Master Plan, the Land Use Map designates all of East Turnagain Bog as “Greenbelt and Noise Buffer.” North Turnagain Bog was designated as “Parks” — the southern boundary of this area appears to include a significant portion of Echo Parking and the proposed realignment of Aircraft Drive in the Draft Preferred Alternative. These areas were part of a larger buffer/parks area established around the entire Airport perimeter. The State of Alaska Department of Transportation officials stated to the Municipality of Anchorage Assembly on March 15, 1983, that the Master Plan-designated buffer surrounding the Airport was a major product of public input, including a citizen committee consisting of representatives of the Sand Lake, Spenard and Turnagain community councils. **This was described as a compromise to protect and buffer the neighborhood from anticipated future growth at the Airport. We all know how extensively the Airport has grown since 1981 and negative impacts associated with that growth have also substantially increased. As a result, the Airport should honor this long-ago buffer commitment to the community in this GA Master Plan.**

2. An ordinance of the Municipality of Anchorage dated February 6, 2001, [AO No. 2000-151 (S-2)] and related MOA Assembly Memorandum [January 30, 2001, No. 928-2000 (S-2)] delineates an area generally defined as North Turnagain Bog and East Turnagain Bog as “Lands

Not Permitted” in Illustration 2 of the documents. This is in reference to language included in the ordinance and memorandum that states:

“WHEREAS, the neighborhoods surrounding ANC are experiencing increased impacts from airport development; and

“WHEREAS, ANC Master Plans have identified portions of Turnagain Bog as an important buffer between surrounding residential areas and incompatible airport industrial uses; and

“WHEREAS, it is in the public interest that the portions of Turnagain Bog identified as “Lands not (sic) Permitted” in green on Illustration 2 (including “Scenic Easement”) remain as a natural buffer between ANC and the surrounding neighborhoods; and

“WHEREAS, it is in the public interest that any future development of the portions of Turnagain Bog identified as “Lands Not Permitted” in green on Illustration 2 (including “Scenic Easement”) be determined pursuant to a public joint planning process between ANC and MOA.

“NOW, THEREFORE THE ANCHORAGE ASSEMBLY ORDAINS: ...

Section 5. Any future development of the natural portions of the Turnagain Bog identified in green on Illustration 2 (“Lands Not Permitted,” including “Scenic Easement”) shall occur only after a master plan for that area is prepared jointly by ANC and the MOA and approved by the Anchorage Assembly after public hearing. The commitment of Ted Stevens Anchorage International Airport to this process, while contractually binding on the airport for this parcel, is not a waiver of its rights or privileges with respect to other parcels under state law.”

This ordinance approved Municipally-owned portions of Klatt Bog to be sold to the Airport and the Airport contractually agreed to the condition that development in the areas known as North and East Turnagain Bogs be allowed to occur only after a joint Airport-MOA master planning process occurred and was approved by the Assembly when it purchased this land from the Municipality. **The Airport GA Master Planning process has not been a joint process with the Municipality and the approval of this GA Master Plan and associated Preferred Alternative will not be put before the Anchorage Assembly for approval.** Therefore, to include development in East Turnagain Bog for proposed lease land in the draft Preferred Alternative is **in direct conflict with the Airport’s own obligation to designate this area as buffer (as well as North Turnagain Bog) in all of its master planning documents until such joint master planning occurs.**

This obligation IS NOT contingent on the existence of the 10-year wetland permit, which has been revoked. Nowhere is this contingency stated in the ordinance. The clear intent of both parties was to allow for the purchase and rehydration of Klatt Bog to mitigate the negative affects of long-term development at the Airport in the high-value wetlands of Postmark and Turnagain Bogs — regardless of which permit it occurs under. **The Airport’s own actions have reinforced this intent.** It is using the purchase of Klatt Bog as mitigation for development projects requiring wetland fills in both Postmark and Turnagain Bogs **under individual permits, not the 10-year wetland permit.**

**3. In the currently adopted Airport Master Plan Land Use Map (November 2002), a section of Turnagain Bog is designated “Buffer.”** This section starts generally north of the snow dump and goes all the way up to W. Northern Lights. **It would make no sense for the Airport to designate a portion of North Turnagain Bog as buffer between development to the west and potential future GA development to the east.** Clearly, what needs buffering is the Turnagain neighborhood from continued development to the west in North Airpark and continuing the North Turnagain Bog buffer designation all the way to the Airport’s eastern boundary would follow this logic — especially since the Airport had just contractually obligated itself to managing these lands as buffer, as per the ordinance referred to in #2. **The Airport’s GA Master Plan Preferred Alternative Map should reflect the currently adopted Airport Master Plan with respect to logic and intent that North Turnagain Bog all the way to the eastern boundary all the way to Turnagain be designated “Buffer.”**

4. As part of the process involving the Airport’s 10-year wetland permit, the Corps and the Airport agreed to prohibit GA development in East Turnagain Bog. This was to help mitigate increasing Airport development and its associated negative impacts on the remaining high-value wetlands and the adjacent neighborhood. The Airport ignores its own acknowledgement that as it continues to develop Postmark and Turnagain Bog wetlands, protecting East Turnagain Bog from GA development is critical. **Whether this development occurs under a 10-year wetland permit or under individual permits is irrelevant when assessing impacts.** Continued development in Postmark and Turnagain Bogs will still result in cumulative, negative impacts — impacts that the Airport and Corps both acknowledged — and the conclusion was that prohibiting development in East Turnagain Bog was a necessary mitigation requirement.

5. Finally, **the Airport rejected GA development east of the gravel strip in East Turnagain Bog — the same area the Airport now proposes lease land, a new taxiway and a new road in the GA MP Draft Preferred Alternative — when evaluating the various alternatives for developing additional GA parking at the Airport.** The Airport’s “Echo Parking Project West/North of Lake Hood Airstrip Draft Environmental Assessment, December 2005” (EA) states on page 11, “This site [“East of the gravel Strip”]...requires investment in additional infrastructure. New taxiway and road connections are required and these would be constructed partially in wetlands. Utilities would be needed, also through wetlands.

“There are impacts to the neighborhood adjacent to the area such as increased noise and loss of a visual buffer to the Strip...The noise impacts from aircraft operations on the parking area and taxiway would range from 39 to 82 dBA. This alternative involves a negative affect to the neighborhood and will likely result in an increase in noise complaints. **The alternative is not acceptable to the neighborhood, it costs more than the preferred alternative [expanding the Echo parking lot] and does not eliminate wetland impacts.** (our emphasis)

“Security at this location would be more difficult to provide due to proximity to residential lands...”

**The Airport contradicts itself** by rejecting the land for one GA project because of impacts to wetlands, removal of the upland treed buffer and proximity to the nearby Turnagain neighborhood, but endorses it for other extremely similar GA projects — GA development, a taxiway and a road, which would result in essentially the same impacts to wetlands, removal of the upland treed buffer and development close to Turnagain.

**CONCLUSION & RECOMMENDATION:** We are now in 2006 and a substantial amount of growth, along with associated negative impacts, has occurred at the Airport since 1981. The Airport has made commitments to the Anchorage community and the Municipality to preserve a natural open space buffer between highly-incompatible land uses. The Airport’s purchase of Klatt Bog wetlands obligates the Airport to designate the identified areas within the Municipal ordinance as buffer until a joint master plan is prepared. The Airport even concluded in its own EA in December 2005 that development in East Turnagain Bog east of the gravel strip would result in unacceptable impacts. Now, more than ever, the Airport should not contradict its own documents, nor should they renege on commitments to the Municipality and community, when dealing with these important buffer areas. **North Turnagain and East Turnagain bogs should be retained in their natural state and become permanently designated natural open space buffers in this GA Master Plan Preferred Alternative and all future Airport master plans. This would ensure that the Airport — through its own evaluations and when it works together with the Municipality and the community to make important land use decisions — does not reverse commitments that would result in negative impacts to community as time passes and the Airport continues to grow.**

#### 4.9 Draft Preferred Alternative for Lake Hood

**A. We disagree with the document’s characterization that the Draft Preferred Alternative “plans a moderate increase in parking and lease land.”** (page 10) Given that the proposal includes constructing more tie-down spaces in Phase 2 and a potential Phase 3 of Echo parking and any number of tie-down spaces, hangers, maintenance facilities, fueling facilities, etc. could be developed in the two parcels designated proposed lease land, the cumulative affect of these proposed project could result in a **significant increase** in aircraft parking and lease facilities at the GA Lake Hood facility.

**CONCLUSION & RECOMMENDATION:** Reword this section to honestly reflect the additional amount of development that the Draft Preferred Alternative would potentially allow — it is significant.

**B.** On page 10 of Chapter 4, the document discusses proposals to keep costs down. The plan states that will be accomplished by “designate mostly upland areas instead of wetlands for lease and aircraft parking.” When looking at Figure 4.7, the Draft Preferred Alternative, all of Echo parking lot Phase 2 (and a potential Phase 3), the realignment of Aircraft Drive, the Lakeshore Drive “Improvement” and all of the proposed lease land south of Echo parking lot Phase 2 are **located in Turnagain Bog wetlands**. In addition, the proposed lease land east of the runway 13-31 and the construction of a new road east of 13-31 contain a **significant amount of wetlands**, and the proposed taxiway east and parallel of Runway 13-31 **falls completely within Turnagain Bog**. **The totality of these projects constitutes the majority of the projects included in the Draft Preferred Alternative in terms of both geographical footprint and cost.**

From a biological standpoint, this of course, will decrease the amount of habitat available to wildlife. Even if substitute wetlands are purchased to mitigate what may be filled at the Airport, the city experiences a net lose of habitat. (The purchase of an existing wetland elsewhere in and of itself does not replace what is filled at the Airport.) Only if the Airport were to mitigate by

creating new habitat would there be potential for break even or net gain. Also from a biological standpoint, not all wetlands are created equal. Preserving a low value wetland for the trade off of filling in a high value wetland does not adequately mitigate the loss. Considering the fact that the Airport contains some of the highest value wetlands in the Anchorage Bowl, every effort and special consideration should be given to the preservation of these wetlands.

From a residential perspective, flooding has occurred at Hood Creek in the past and the wetlands serve as a catch basin for floodwaters. Turnagain Bog serves this purpose for the Turnagain neighborhood watershed and there is an increased potential for flooding if a significant portion of wetlands adjacent to Turnagain are filled. The wetlands in this area also filter out pollutants that otherwise would end up in Jones Lake and Hood Creek, which flows through Turnagain (both in culverts and as surface water). Lastly, these areas provide the residential areas adjacent to the Airport critical buffering from high-impact operations at the Airport.

**CONCLUSION & RECOMMENDATION: Our conclusion is that large portions of Turnagain Bog would need to be filled for the majority of projects proposed under the Draft Preferred Alternative and the Master Plan needs to admit this.** Based on the Airport’s own conclusion, development of projects in these wetlands would be expensive. This is due to the need to dig out peat, backfill with buildable soils, ensure the integrity of water quality and hydrological functions of remaining wetlands and waterbodies, and mitigate for the filling of high value wetlands during the Corps permitting process. The cost to the quality of life to nearby neighborhoods is too impossible to calculate. Suffice it to say, the residents would pay a high price due to impacts of the development of the majority of the Draft Preferred Alternative projects. **As currently worded, the draft document is substantially inaccurate and does not reflect the extent to which wetlands would be negatively impacted by the draft Preferred Alternative development proposals.**

#### **Table 4.9 Draft Preferred Alternative Projects**

##### **A. East Parallel Taxiway, New Road East of 13-31 & Designation of Land East of Runway 13-31 for GA Lease**

**In addition to the Airport’s previous commitments to the Municipality of Anchorage and the community, its own Master Plans, and its own conclusion to reject development in East Turnagain Bog just last year, as extensively documented on pages 4-6, we oppose the East Parallel Taxiway, the New Road East of 13-31 and the Designation of Land East of Runway 13-31 for GA Lease proposals** for the following reasons: the proposed projects would locate development closer to the adjacent residential area than what now exists; they would require filling in of important, high-value wetlands, as discussed above; increased noise would be generated by these two projects and the critical tree buffer east of the runway would be removed, which now helps buffer the Turnagain neighborhood from noise impacts; and the location of both projects are in an area that should be designated as a natural open space buffer, as discussed above.

A Noise Assessment Report was conducted by HMMH as part of the Airport’s 10-year wetland fill permit application process several years ago. According to the Noise Assessment Executive Summary, “The loudest single engine events audible in residential areas will be GA aircraft starting-up and taxiing near Runway 13/31...Individual GA aircraft ground activities may cause outdoor speech interference at the homes closest to Runway 13/31...Simultaneous, multiple GA



aircraft ground activities have the potential to cause indoor speech and sleep interference at the closest homes.”

The report goes on to state, “Following truck traffic, GA aircraft start-up and taxiing activities at the existing and new tie-down areas and lease lots near Runway 13/31 are predicted to cause the highest project-related sound levels in the residential areas...the new tie-down area and additional lease lots near the north end of Runway 13/31 will expose the area near Site 1 (Wendy’s Way) to higher start-up noise levels and more frequent events than in the past.” Based on that information, it is clear a cumulative and significant increase in noise generated by the an East Parallel Taxiway, Lease Land East of Runway 13-31, and additional tie-down spaces at Echo parking so close to the Turnagain neighborhood would occur.

**CONCLUSION & RECOMMENDATION:** The East Parallel Taxiway and the designation of land east of the Runway 13-31 for lease **should be removed** from the GA Master Plan Preferred Alternative. In its place, the entire area of East Turnagain Bog should be designated “Permanently Protected Natural Open Space Buffer.”

## **B. Echo Parking Expansion & Aircraft Drive Relocation**

**We oppose the inclusion of the Echo Parking Expansion and the Aircraft Drive Relocation around Echo** in the Draft Preferred Alternative for numerous reasons including those listed above. The proposal to double the size of wheeled tie-down spaces closer to the Turnagain neighborhood does not represent the Airport’s desire to “be a good neighbor,” as Director Plumb has expressed to the community numerous times.

As revealed during the GA Master Plan process, 20-year projection for operations at the Lake Hood facility are predicted to be **significantly lower than operations during the mid-1980s**. So the need to build more tie-down spaces to accommodate fewer operations is not justifiable. The wait list for tie-down spaces is significantly less than in the 1980s and, according to the Airport and its consultants, this trend is likely to continue during the next 20 years due to current pilots getting older and much higher expenses associated with private plane ownership, including rising fuel prices, which are unlikely to decline in the next 20 years.

A requirement that there be no increase in GA wheeled aircraft tie-down spaces, developed either by the Airport or by private leaseholders, was included in the Corps 10-year wetland permit issued the Airport a few years ago. This permit has since been revoked, but the condition was required by the Corps to specifically address the public concerns regarding traffic, noise and air quality impacts from GA operations as individual wetland fill permits move forward. This rationale is still valid and the Preferred Alternative should not include any expansion of tie-down areas in the GA area from what currently exists. No additional lease lots that would add private tie-down spaces should be allowed as well.

Merrill Field currently has wheel aircraft tie-down spaces available for lease and now has both paved and gravel runway capacity to serve GA pilots in the Anchorage Bowl area.

If a goal of the Master Plan is to keep costs down, as referred to earlier, then the realignment of Aircraft Drive counters that goal. Legitimate alternatives to address safety issues with at-grade taxiway/road crossings exist, as the Airport uses them in other areas. Installing flashing lights

and railroad-type crossing arms, like those on at the intersections of Victor Taxiway and Postmark Drive or Victor Taxiway and Aircraft Drive would provide reasonable and less expensive means of providing safety at-grade crossings. Another idea is to install electronic reader boards on each side, which would also alert drivers to the taxiway intersection. These alternatives to completely rerouting a significant portion of Aircraft Drive would not only be much less expensive, it would eliminate the need to fill in Turnagain Bog wetlands and clear trees north of Echo Parking, which provide important aesthetic values and buffering functions. In addition to the above, **we are now fully aware that the Airport planned all along to build these two projects in the summer of 2006 regardless of the outcome of the GA Master Plan public process. This is in total disregard of the Master Planning public process.** It is unacceptable and completely de-legitimizes the federally-funded Master Planning process and associated alternatives the airport put forth **for consideration** with input from the Technical Advisory Committee and the community. The public was not told up front that these projects were going to be built no matter what when the GA Master Planning process started. For Deputy Director John Parrott to admit to the Turnagain Community Council that it was an “administrative error” on their part doesn’t justify moving forward with these projects that will result in negative impacts to the community. And, **considering the significant impacts associated with these projects if developed, the error is egregious enough to taint the process and force a reevaluation of the development of the Master Plan Draft Preferred Alternative.**

**CONCLUSION & RECOMMENDATION:** For all of the above reasons, the expansion of Echo Parking lot to the east of the existing lot and the realignment of Aircraft Drive should be removed from the Draft Preferred Alternative. In addition, due to the significant “administrative error” that has occurred during this process, **a reevaluation of this process should take place by the Federal Aviation Administration.**

### **C. Lakeshore Drive Improvement & Designate Land East of Echo for GA Lease**

We are still unclear regarding the exact nature of two related projects, the Lakeshore Drive Improvement and Designating Land East of Echo for GA Lease. Figure 4.8 doesn’t provide enough detail to understand the extent of these projects.

**CONCLUSION & RECOMMENDATION:** However, based on previous statements with regard to filling of Turnagain Bog wetlands, realignment of Aircraft Drive, and adding additional lease land closer to residential areas, **we generally oppose the concept** of these two projects, but would be **willing to reconsider** if legitimate safety issues dictate a need for the Lakeshore Drive project, as long as it ties in with the existing Aircraft Drive. Also, because the wetland area inside of the curve of the existing Aircraft Drive is isolated due to extensive development in the adjacent area, allowing leasing of that land (up to the existing Aircraft Drive curve) seems reasonable, if **an important requirement is included in the lease:** a landscaped buffer of evergreen trees be planted on the eastern edge of the lease area to mitigate locating GA development closer to the Turnagain neighborhood.

### **D. New Pathways**

**We applaud the Airport for listening to the community and rejecting the initial idea of placing a pathway along the eastern boundary of the Airport.** We also **support the conceptual alignment of a new pathway around the lake area**, as shown on Figure 4.8, with

details to be decided when the project is funded. Both Spenard and Turnagain residents enjoy and recreate in the GA area and this project, which should get the highest priority (okay, maybe after the installation of restrooms), will go a long way in resolving recreational and GA safety concerns and conflicts. We look forward to participating in the implementation of this project.

#### **E. Misc. Additional Fencing & Evaluate & Improve Moose Fencing**

Several years ago, North Turnagain Bog was completely fenced in without public notice and without any comprehensive evaluation of wildlife impacts within the bog areas. Since then, additional fencing has been erected, but seems arbitrary and does not limit moose access to the runways or taxiways. **We support the concept of the fencing proposals in terms of doing a comprehensive evaluation of where fencing needs to be installed for security reasons and where fencing should be realigned, added and/or removed to provide better management of moose movement** in the GA area. This effort should include removal of the fencing around North Turnagain Bog, so that the moose can use this natural habitat area. As stated in Chapter 4, page 14, involvement of the community and wildlife biologists familiar with the area and the moose population will be critical components of this effort and we look forward to serving on the task force on these projects.

#### **F. Acquire Houses in RPZ**

The Turnagain Community Council has, in the past, opposed the Airport's acquisition of homes at the end of Wendy's Way and advocated for alternatives that would either result in movement of the Runway Protection Zone (RPZ) or obtaining an exemption from FAA. TCC still feels that it is unfortunate that homes will be removed and residents displaced as a result of this proposal, but is **satisfied that the airport has exhausted reasonable options and is left with this as the best recourse for resolving a safety concern.** TCC does request that there be **no clear-cutting of the trees** in the area once the homes to be removed are acquired and **careful removal of the homes minimize tree and other vegetation removal**, as those will still serve as an important buffer for the remaining residents at the end of Wendy's Way. We also request that when the land is purchased, a plat is added, **stating that preservation of the trees is allowable in a RPZ** and that removal of trees in the RPZ in this area is prohibited unless there is a safety justification.

#### **G. Acquire 1.5 acres of Lakeshore Drive**

Because the Airport has not provided the public information from the Municipality of Anchorage (MOA) as to whether the city supports the Airport's acquisition of the 1.5 acres of land along Lakeshore Drive, it is difficult to know what position we as community organizations should take. We reserve comment until the MOA's views on this proposal are known.

**CONCLUSION & RECOMMENDATION:** However, we do have a concern and a proposal: Firstly, we are concerned that if the Airport takes control of the Lakeshore Drive road easement, **it could limit use of that road to the public at anytime in the future**, including closing off access to areas now used and enjoyed by the public, such as the Lions Club Picnic Area and a proposed new pathway around the GA lake area. **We would oppose any such restrictions.** Also, during this Master Planning process, Technical Advisory Committee members and the public came out in strong opposition of limiting access to the GA area and closing or restricting road access and the Airport needs to be continually cognizant of that when managing this road, if it does acquire the easement.

Secondly, depending on how the MOA feels about this proposal, we offer an idea for potential consideration: **the Airport and the city do a land exchange**. The city gives the Airport the 1.5 acres of Lakeshore Drive and, in turn, receives title to Spenard Beach Park. This would resolve a long-standing issue and once and for all assure the community that the park will be a permanent recreational area for our city.

#### **H. Designate Special Lease Lot**

We have no problem with the Draft Preferred Alternative designating the area east of the Department of Transportation building a Special Lease Lot, with a use to be determined at a future date. It seemed to be the consensus of the Technical Advisory Commission that the relocation of the Aviation Museum to this spot would be a good idea, but not necessarily the only option. There are trees on the southern portion of this parcel and **we request that those trees, which provide aesthetics along the busy International Airport Road, be preserved** when considering/approving any lease proposal.

#### **I. Keep Recreational Use of Spenard Beach & Lions Club Picnic Area**

**We support the Draft Preferred Alternative's inclusion of preserving two important and popular recreational areas in the Turnagain/Spenard area.** As stated earlier, the public and the Airport have dealt with this contentious issue over many years. The Airport deserves praise at this time for recognizing the value of these park areas to the community and including in a long-term Master Plan the continued public use of Spenard Beach Park and the Lions Club Picnic Area.

**CONCLUSION & RECOMMENDATION:** **As a long-term goal, we feel the city should acquire Spenard Beach Park** to ensure its permanent place as a recreational destination for residents and visitors to Anchorage to enjoy. This would preclude future debates and Airport proposals to terminate leasing the area to the city for park uses and develop the area into GA facilities. Please refer to discussion under G. above.

#### **J. Change Former AvAlaska/Village Aviation Land Use to Airport Support from GA**

At their January 17, 2006, meeting, the Technical Advisory Committee expressed a desire for this area to remain a GA-designated area, instead of using it for Airport administrative purposes, as proposed in the Draft Preferred Alternative. **We concur with the committee** that this would be the best use for this land. The area is already developed (i.e., wetlands have already been filled/natural vegetation has already been removed); it is located close to Charlie Parking and has good access to the North-South runway as well as the gravel strip via Victor Taxiway; and most importantly, it is located farther from the residential areas than the two proposed lease areas in the Draft Preferred Alternative, which would eliminate the need to locate lease lands in Turnagain Bog, closer to the residential areas of Turnagain. This facility provided 40-50 spaces for tie-downs and has the potential for that and perhaps more, if designated as lease land in the Preferred Alternative.

**CONCLUSION & RECOMMENDATION:** **The old AvAlaska/Village Aviation land should remain available for GA use as lease land**, including tie-down spaces, which negate the "need" (see below) for additional tie-down spaces and lease land in Turnagain Bog, closer to Turnagain homes.

#### 4.9.2 Draft Preferred Alternative Landside (Part 1)

The discussion in Chapter 4, page 13, of the Draft Master Plan includes a breakdown of aircraft parking spaces and storage spaces. It states that currently there are 1,136 spaces at the Lake Hood GA facility and that this falls 129 spaces short to meet the projected 20-year demand for 1,265 spaces.

On page 15, the discussion continues, siting a projected need for 19 acres for a fixed base operator, business expansions, new businesses, fueling, and an aviation museum in 20 years. According to the document, the net gain in lease lot acreage in the Draft Preferred Alternative would be 21.7 acres.

However, the projected demand number of 1,265 spaces and the need for 19 acres of lease land for the next 20 years **was based on an unconstrained, build-whatever-we-want-with-no-identifiable-restrictions scenario**. Every Master Plan starts out with these kinds of pie-in-the-sky numbers, but the prudent next step in the process is to constrain these figures by factoring in important elements, such as demand trends, project cost/benefit analysis, economic climate, and environmental and social impacts. **As stated on an Airport GA Issue Handout dated 4/6/04, “The forecast must be constrained** due to the difficulties in expanding facilities to meet demand.” This has not been done and **the Draft Preferred Alternative instead seeks to accommodate unconstrained demand figures**.

**A. Demand:** As stated previously, according to the Airport’s own projections, the 20-year forecast for Lake Hood GA operations will be significantly lower than operation numbers that occurred in the 1980s. In the Master Plan’s Chapter 2, page 2-5, it states, “Over the past 15 years, Lake Hood operations have declined by about 2.4 percent per year and GA operations have declined about 1.4 percent per year.” In actual numbers, Lake Hood operations decreased by 24,151 from 1989 to 2003 (Table 2.4). The document goes on to state on page 2-10, “The number of active pilots per capita also has dropped off in the last 15 years. Between 1989 and 2003 the number of active pilots per capita decreased by about 2.5 percent per year.” Page 2-12 states, “...the number of active pilots per capita is expected to decrease by about 0.3 percent per year over the forecast period.” Finally, the GA Master Plan states on page 2-20, “Operations at Lake Hood are expected to increase by between 0.7 percent and 1.3 percent per year over the forecast period, from 58,354 in 2003 to between 67,231 and 74,966 in 2023.”

While one could conclude in a vacuum that this projected operations increase justifies the proposed development under the Draft Preferred Alternative, the reality is the high-end projection growth — 74,966 — still falls short of the number of operations that took place in 1989 — 82,505. **When factoring in the totality of these numbers, projections fall far short of historical numbers and the “demand” for the increase in spaces (1,265) and acreage (21.7 acres) cannot be justified.**

#### Table 4.10

Once again, we ask that the Airport refer to a State document that contradicts its own projected need for additional wheeled tie-down spaces. The Alaska Department of Transportation & Public Facilities “Anchorage Area General Aviation System Plan” dated June 2003 states on page 11-3, “...this Airport [Lake Hood Airport] is expected to provide space to accommodate about 360

float planes **and 400 wheeled aircraft by 2020.**” This contradicts the Airport’s information provided on Table 4.10, page 13, of the GA Master Plan, which indicates Future Total Wheeled spaces to be 475. The Airport provides no information as to why they increased projected numbers by 75 spaces from a study conducted under a planning process funded by the Federal Aviation Administration to comprehensively evaluate airports and their GA facilities within the Municipality region. **Based on the findings of this study, it appears that the Draft Preferred Alternative proposal to double the number of tie-down spaces at Echo parking is not needed to satisfy GA use projections at the Airport.**

## **B. Constraints:**

**1.** The GA Master Plan states on page 2-8, “For purposes of this forecast, Lake Hood and ANC are assumed to be physically unconstrained. For the purposes of this study, “physically unconstrained” means there is sufficient airfield and landside facilities at Lake Hood and ANC to accommodate GA activity dictated by demand.” This is a false assumption, as pointed out on pages 4-6 of this comment letter. **Development of a taxiway, road and lease lots in East Turnagain Bog, as proposed in the Draft Preferred Alternative, should be prohibited and the area should be designated a permanent natural open space buffer in the Preferred Alternative. This would then result in a constraint on available land for GA development.**

**2.** As pointed out on pages 7-8 of our letter, development of the majority of the projects in the Draft Preferred Alternative in terms of cost and physical footprint would occur in high-value Turnagain Bog wetlands. **This is an environmental constraint that the forecast demand assumption does not take into account.**

**3. Locating additional GA facilities and subsequent operations that generate negative impacts on the adjacent Turnagain neighborhood have also not been factored in as constraints by the forecast demand projections.** Impacts include increased noise and removal of current treed noise buffers, air pollution emissions closer to the residential areas, filling of wetlands, which could negatively impact water quality and hydrology of remaining Turnagain Bog wetlands, Hood Creek and Jones Lake, and the cumulative impacts of other Airport operational growth, particularly cargo operations.

**4.** The Airport has not provided any **Draft Preferred Alternative proposed development and resulting operations noise contours that would indicate level of noise impacts on recreational users and Turnagain residents.** Diana Rigg stated at the May 17, 2005, Technical Advisory Committee meeting that this would be done. **This is also a constraining factor that has not been taken into account when determining demand forecast projections.**

**5.** On page 2-8 of the GA Master Plan it states, “The forecasts assume no major increase in tie-down fees over the forecast period.” In 20 years, the Airport does not intend to increase fees to reflect increases in maintenance and operating costs? This seems unrealistic as well as poor fiscal management by the Airport. As stated on the April 6, 2004, GA Issues Handout, “Lake Hood does not generate enough revenue to cover the \$1.5 million annual operating and maintenance cost. Revenue is largely from land leases and no landing fees are charged.”

If tie-down and lease lot fees increase over time — and landing fees are added in the future — to ensure Airport expenses at the GA facility are covered, which would be the fiscally prudent thing

to do, this likely would result in a decrease in tie-down space demand — and **this potential constraint is not reflected in the demand forecast projections.**

6. Lastly, and probably one of the most important in terms of Airport fiscal responsibility, no cost/benefit analysis has been done on the Draft Preferred Alternative development proposals, as stated would be done by Airport Director Plumb to the Technical Advisory Committee at their April 19, 2005, meeting. **This analysis, which should be done before any final GA Master Plan Preferred Alternative is finalized, will likely show that the cost/benefit of most of the proposed projects cannot be justified.** This is in comparison to the greater social and environmental negative impacts to the community and the increase in annual maintenance and operating expenses these additional developments will generate if the proposed projects are developed. **This financial constraint has not been reflected in the demand forecast projections.**

**CONCLUSION & RECOMMENDATION: It would be irresponsible for the Airport to move forward with the major development proposals — most notably the Echo Parking expansion and the lease lots, taxiway and road east of the gravel strip — included in this Draft Preferred Alternative.** The Airport’s justification for the projects are to meet demands that are questionable at best — based on the Airport’s and State’s own 20-year use projections. These demands are also based on unconstrained forecasts and by the Airport’s own admission, these forecasts must be constrained to determine what projects should be included in the final GA Master Plan Preferred Alternative. **Until a noise contour is produced, a cost/benefit analysis is done, and the above discussed constraints are imposed on the Airport’s demand forecast numbers, and the public and the Technical Advisory Committee has an opportunity to review and comment, no final Preferred Alternative should be approved.**

#### **4.9.2 Draft Preferred Alternative Landside (Part 2)**

As discussed on page 11 of our comment letter, **we support the development of a task force that would include neighbors of the Turnagain community and wildlife biologists to evaluate fencing at the GA complex,** as discussed in Chapter 4, page 14, of the GA Master Plan. We feel it will result in fencing that will better serve Airport/pilot security issues, yet provide for public access, where appropriate, and improve wildlife (particularly moose) circulation in the wetland and upland areas outside of the GA developed areas (specifically North Turnagain Bog.

Continuing on page 14, **we have to now question the motivation as stated in the GA Master Plan for rerouting vehicular traffic via a realignment of Aircraft Drive.** It states, “Vehicular traffic on Aircraft Drive from Northern Lights would be routed around the expanded Echo Parking, making travel through the airport **less direct and thus less desirable.**” (our emphasis) Based on the Airport’s rejection of the community’s request to tighten the sweeping curve design of the road to avoid a stand of trees from being cleared and to slow traffic down and make the use less welcoming to drivers, the road as currently designed essentially puts out a big “Welcome — Please Use This Road to Come Into the Airport” invitation. As Deputy Director Parrott described to TCC Vice President Cathy Gleason on April 5, 2006, a sweeping curve design will “better serve Airport traffic.” This doesn’t sound like a design that makes “travel through the airport less direct and thus less desirable.”

**CONCLUSION & RECOMMENDATION:** The Airport can't seem to make up its mind on what rationale to use to reroute Aircraft Drive around Echo Parking. **The design of a sweeping curve will increase usage of W. Northern Lights through Turnagain and Aircraft Dr. to go to and from the Airport, not discourage it.** We request that if the Airport insists on the realignment of Aircraft Drive as a project in the GA Master Plan, rather than use flashing lights, railroad arms and other means to manage traffic at the Aircraft Drive/Echo Taxiway at-grade intersection, that the Airport **reconsider the community's request to initiate the curve of the realignment south of the treed area/sewer line/utility box area. We feel it would better serve the Airport's justification for this project, as described in Chapter 4 of the Master Plan as well as better serve the Turnagain community.**

As stated previously on page 10 of our comment letter, **we support the proposed pathway loop around the lakes** to accommodate pedestrian/bike usage of the area and feel it will contribute to fewer conflicts on taxiway/road surfaces, as described on Chapter 4, page 15.

#### **SUMMARY:**

This joint comment letter on the GA Master Plan Draft Preferred Alternative and supporting Chapter 4 of the MP from Alaska Center for the Environment, Anchorage Waterways Council, Spenard Community Council and Turnagain Community Council provides **a lengthy discussion of rationales, conclusions and recommendations that we feel must be addressed by the Airport and its consultants in any final GA Master Plan/Preferred Alternative.**

We support the uniqueness of the GA Lake Hood complex and the benefit it offers this community. However, protection of nearby neighborhoods and high-value habitat must not be sacrificed to promote development based on unconstrained forecast demands. With limited funding, prior commitments by the Airport, contractual obligations, land conflicts, negative impacts from GA operations, and high-value wetlands and wildlife habitat all taken into consideration, the 20-year GA Master Plan should concentrate on immediate needs and enhancing the uniqueness of the float-plane identity, while still protecting residential neighborhoods and the environmental values of the area.

As stated earlier, this Master Plan process provides an opportunity for the community, general aviation users and the community at large to come up with a preferred alternative that balances aviation needs with community interests with an end result we can all support and be proud of.

Sincerely,

Andre Camara, Alaska Center of the Environment Local Issues Coordinator  
Mark Wiggin, Turnagain Community Council President