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# Turnagain Community Council

c/o TCC Acting President Cathy L. Gleason  
tccpresident@yahoo.com

**DRAFT**

May 4, 2023

Mr. John Louie  
Environmental Engineer  
FAA ATO Engineering Services WSA  
FAA Alaska Region  
222 West 7th Avenue #14  
Anchorage, Alaska 99513-7587

Sent via email

Dear Mr. Louie,

The Turnagain Community Council (TCC) appreciates the opportunity to comment on the proposed Relocation of the Federal Aviation Administration (FAA) Air Traffic Control Tower/Terminal Radar Approach Control Facilities at the Ted Stevens Anchorage International Airport (TSAIA/Airport) — which would also necessitate relocation of the Charlie Parking General Aviation Tie-down area (Charlie Parking) located at the Lake Hood Seaplane Base (Lake Hood).

As one of three Community Councils that borders TSAIA, TCC coordinates with Airport staff on a regular basis and provides public comment on permit and lease applications, Airport plans, and documents being prepared for compliance under the National Environmental Policy Act (NEPA). As the Airport has continued to grow over time, Turnagain residents have increasingly expressed being negatively affected by a number of long-standing impacts and issues associated with development and operations at TSAIA, Lake Hood, and from off-Airport activities; these are addressed in our comments on the Air Traffic Control Tower/Charlie Parking Relocation development proposals.

Noting that your letter references “a public process in accordance with 40 CFR Part 1501.9” and “early and open process to determine the scope of issues for analysis,” TCC considers this letter as a request for comments under National Environmental Policy Act (NEPA) requirements for scoping in the preparation of an Environmental Assessment (EA). Scoping in compliance with NEPA typically requests comments on the following:

- 1) Issues for analysis in an environmental assessment, including identifying the significant issues and eliminating from further study non-significant issues;
- 2) The area of analysis for assessment of environmental impacts, including potential cumulative impacts, which determines the geographic scope of the affected environment;
- 3) Alternatives to be considered in the EA, including but not limited to the Proposed Action and a No Action alternative; and
- 4) Identification of any information that should be relevant in preparing the EA.

## Understanding the Scope of the Proposed Action

From the information contained in the request for comments and presentations on the proposed Air Traffic Control Tower Relocation, it is our understanding that the proposed project would result in the construction of a new 23-story Air Traffic Control Tower in the immediate vicinity of the Charlie General Aviation (GA) aircraft tie-down area. This, in turn, would require the relocation of 39 GA tie-down spaces. Your April 17, 2023, letter to TCC stated that the preferred alternative (Alternative B) for the tie-down spaces is expansion of the existing Echo GA tie-down area as well as relocation of a portion of Lake Hood Drive to accommodate the expansion.

## Issues for Analysis in the Environmental Assessment

TCC requests that the following *issues, potential adverse direct, indirect, and cumulative impacts, and potential mitigation measures* be assessed in the EA:

### Changes in Lake Hood and other Civilian Air Traffic Patterns

The relocation and construction of a 23-story Air Traffic Control Tower at the proposed location has the potential to affect existing air traffic patterns at Lake Hood and between other civilian aircraft operating areas to the south, north and east of Lake Hood. *The EA needs to assess any impacts of potential altered flight patterns, including air craft safety and aircraft noise impacts to the adjacent Turnagain neighborhood.*

### Airport-Generated Air Noise

TCC has continuously expressed concerns regarding increased noise levels from aircraft flying over or near Turnagain neighborhoods adjacent to TSAIA. *Relocation of the Air Traffic Control Tower and expansion of Echo GA parking could affect civilian air traffic patterns and generate more aircraft noise over adjacent neighborhoods; as state above, this needs to be assessed in the EA.*

### Airport-Generated Ground Noise

The relocation of the 39 Charlie Parking spaces northwest of the existing Echo GA facility and east of the existing Lake Hood Dr. route would increase GA aircraft operations near the adjacent Turnagain neighborhoods. *Additional ground noise generated by GA aircraft engine start-ups and taxiing from this expanded Echo GA area — and the cumulative impacts of adding to existing ground noise impacts from all forms of aviation activity at TSAIA that already negatively affect residents in this area of Turnagain, need to be assessed in the EA.*

A large stand of deciduous and evergreen trees and other vegetation northwest and east of the existing Lake Hood Dr. and Echo GA facilities currently provide ground noise mitigation/buffering from existing aircraft noise impacts from TSAIA operations, especially those generated by cargo planes at North Airpark. *Expansion of Echo GA parking to the northwest — to accommodate an additional 39 tie-down spaces and relocation of a portion of Lake Hood Dr. to the north — would result not only in the removal of this important ground noise buffer, but replace it with additional ground noise generated by GA operations near Turnagain neighborhoods. The cumulative impacts of this action needs to be assessed in the EA.*

### Air Quality

Continued degradation of air quality, primarily associated with jets and jet fuel, has been a continual and increasing concern for Anchorage residents living in the vicinity of TSAIA. It is unclear to what

degree the proposed project, which will locate use of aircraft engines closer to the Turnagain neighborhood, will potentially affect air quality, but it will place 39 additional aircraft closer to the northern Turnagain neighborhood. Removal of the treed areas within Turnagain Bog referenced above not only provide ground noise buffering, but also absorb Airport-generated CO<sub>2</sub> emissions near residential areas. *Evaluation of potential increased air quality impacts to the Turnagain neighborhood as a result of the proposed development should be assessed in the EA.*

#### High Value Turnagain Bog Wetland Fill

The proposed expansion of the current Echo GA Parking to the northwest and relocation of a portion of Lake Hood Dr. is proposed to be located within the Turnagain Bog wetland complex, identified in the Anchorage Wetlands Management Plan (AWMP), July 2014, pg. 51, as “Class A,” the highest wetland value designation: “The wetland provides high value functions for groundwater recharge, water quality, stormwater attenuation, aesthetic and noise buffering, and habitat values.”

Filling a minimum of 4.45 acres of Class A Turnagain Bog wetlands/uplands that would be required to expand Echo GA parking and relocate a portion of Lake Hood Dr. would have *significant impacts* on the above-cited functions, including the hydrological viability of not only the remaining Turnagain Bog wetlands, but also on nearby Turnagain Pond to the west, and Jones Lake and Hood Creek to the east in the Turnagain neighborhood.

The AWMP includes Management Strategies and Enforceable and Administrative Policies regarding Turnagain Bog cumulative impacts. It states,

*“Cumulative impacts shall be considered for future fill actions, as the bog has lost approximately 200 acres since 1996 (that acreage loss was as of 2014).”*

*As per the Enforceable Policies cited in the AWMP, the EA needs to address the significant and cumulative impacts associated with developing infrastructure for 39 GA tie-down spaces and the relocation of a portion of Lake Hood Dr. — and what potential mitigation will be proposed to address the multitude of cumulative impacts to the Turnagain Bog wetland complex, if this proposed development is approved.*

One other important AWMP directive included in the Management Strategies and Enforceable and Administrative Policies regarding Turnagain Bog also needs to be addressed in the EA:

*“The main Turnagain Bog core contains patterned ground wetlands and shall be maintained and buffered to the maximum extent possible permitted with uses per the AIA Master Plan.”*

While the language refers to the AIA Master Plan, it’s logical to assume this would also apply to the Lake Hood Seaplane Base Master Plan Update (LHD Master Plan). *None of the four LHD Master Plan development alternatives (Figures 5-1 to 5-4, A-D) include expansion of Echo GA parking or relocation of Lake Hood Dr. northwest and into existing Turnagain Bog wetland/uplands.*

Your letter to TCC dated April 17, 2023 (pg. 3) confirms the above — Echo GA parking expansion and relocation of Lake Hood Dr. (identified as Alternative B) was *not* included in the LHD Master Plan: “Alternative B is not listed in the approved Lake Hood Master Plan and it was believed that for development to occur at that location would require re-opening the LHD Master Plan.”

*Bottom Line: Expansion of Echo GA parking or relocation of Lake Hood Dr. northwest/east and into Turnagain Bog wetland/uplands would seem to be in violation of the AWMP Enforceable and Administrative Polices — and it does not comply with the current LHD Master Plan. The EA needs to address these conflicts, and make a determination regarding the need to update the current Lake Hood Master Plan before further consideration of the proposed Alternative B project moves forward.*

### Construction Traffic

Turnagain residents have also seen and documented a significant increase in vehicle traffic from commuters and operators at the TSAIA North Airpark, including a major increase in large freight truck traffic, on the portion of West Northern Lights Blvd. (WNL) that runs through the Turnagain neighborhood. This road corridor — which was designed and built to Neighborhood Collector standards from Wisconsin St. to Nathaniel Ct. — includes Turnagain Elementary School and associated pedestrian crosswalk, and several residential subdivisions. It has become less safe as more large trucks use this road during all hours of the day and night, traveling at unsafe speeds directly adjacent to bike and pedestrian facilities, and releasing diesel exhaust that affects air quality in the Turnagain neighborhoods and school campus.

Construction activities associated with the relocation of the Air Traffic Control Tower and expansion of Echo GA parking have the potential to increase worker and truck traffic levels on WNL during the period of construction. *The EA needs to assess these air quality — and safety — impacts, and require that all construction traffic associated with this project access the Airport construction sites via International Airport Road.*

### Cumulative Impacts

Activity from the Airport currently causes significant impacts to surrounding residential neighborhoods, recreational assets, and natural open space/wildlife habitat. There are several proposed air cargo-related as well as General Aviation-related development projects under consideration at TSAIA/Lake Hood Seaplane Base. *The Environmental Assessment must assess all of these proposed projects as a whole — and the increase in cumulative impacts they would impose on the neighborhood and nearby natural areas — rather than consider each one independent of the rest.* As repeatedly indicated above, increased cumulative impacts remain a significant concern to Turnagain residents.

### Area of Analysis for Assessment of Environmental Impacts

Given the potential adverse direct, indirect, and cumulative impacts described above, *TCC requests that the EA include analysis to the level needed to thoroughly and comprehensively assess negative impacts from potential air traffic pattern changes, increased air and ground noise, air quality/increased air pollution, wetlands fill, construction traffic, and cumulative impacts from Airport-generated construction and operations.* This would include impacts to the residential neighborhoods to the east of TSAIA/Lake Hood and along WNL; areas along and under any changes to civilian air traffic patterns; and wetlands and waters connected to the Turnagain Bog Complex. Depending on what alternatives are included for relocating the Air Traffic Control Tower, the area of analysis might need to be expanded — and consideration of a full Environmental Impact Statement may be required.

## Alternatives to be Considered in the EA

It is our understanding that the FAA prepared a study of potential siting locations for the relocation of the Air Traffic Control Tower. We assume that the study will be referenced in the EA and the evaluation/viability of each alternate site will be included in the EA. *TCC is asking to be provided a copy of that study before the Draft EA is released; and we may have further comments on alternative site locations that should be considered.*

In meetings with the Airport discussing the proposed Air Traffic Control Tower and Charlie GA parking relocation, TCC has recommended consideration of redistributing at least some of the 39 Charlie GA parking spaces to other Lake Hood aircraft parking and vacant areas, in order to minimize the amount of wetland fill needed to expanding the Echo GA parking area — and potentially completely *avoiding* the need to relocate of a portion of Lake Hood Drive. While this proposal would still require filling of wetlands, it would avoid the larger impacts that would result in developing a bigger, contiguous area of Turnagain Bog wetlands and associated uplands for GA parking spaces relocation of Lake Hood Dr. *TCC requests that this alternative be assessed in the EA.*

Another proposal that TCC requests for consideration, if this dual project relocation/development takes place, is to *require on-site wetland fill mitigation* by setting aside for permanent protection a significant portion of Turnagain Bog Class A wetlands/uplands located east of the Lake Hood gravel airstrip and adjacent to Turnagain neighborhoods.

Again, thank you for the opportunity for Turnagain Community Council to provide scoping issues we feel are important to include in the Draft Environmental Assessment projected to be released for public review in August. As outlined in our letter, there are numerous and cumulative impacts to analyze when assessing environmental impacts associated with the proposed relocation of the Air Traffic Control Tower and Charlie GA parking at TSAIA. TCC asks that FAA and TSAIA give full consideration to our input and mitigation requests — as well as acknowledging and assessing the cumulative impacts from other existing and proposed North Airpark and Lake Hood Seaplane Base development and operations. Please do not hesitate to contact the Council, if you have any questions or would like to discuss in more detail our comments contained in this\ letter.

Sincerely,

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CC: