

Turnagain Community Council

Board of Directors

c/o President Jonathan Tarrant
1057 W. Fireweed Ln.
Suite 100
Anchorage, AK 99503

December 22, 2016

Ms. Roberta Budnik
US Army Corps of Engineers, Alaska District
Anchorage, Regulatory Division (1145)
CEPOA-RD
P. O. Box 6898
JBER, Alaska 99506-0898

RE: POA-2016-500 — LAKE HOOD

Sent via email

Dear Ms. Budnik,

Please accept the following comments submitted by the Turnagain Community Council (TCC) Board, which reflect current TCC positions related to Turnagain Bog. The wetland fill permit application refers to "Lake Hood," but because this application proposes development in the Turnagain Bog wetland identified as "26A – Turnagain Bog Proper" in the Anchorage Wetlands Management Plan (AWMP), TCC's comments will refer to the site of the wetland fill application and adjacent wetlands and any associated uplands as Turnagain Bog or TB.

TCC has followed wetland fill permitting and development in Turnagain Bog for many years, as this high-value wetland is located near the Turnagain neighborhood within our council boundaries. Over time, Corps-approved development in TB has resulted in the destruction of a large portion of the original bog area. As such, TCC requests that the Corps' evaluation of the above referenced wetland fill permit application to fill 7.38 acres of Class "A" Turnagain Bog wetlands include the evaluation of the impacts — not only of filling this specific acreage of TB — but also the cumulative impacts of development to this high value wetland in West Anchorage.

Further, TCC requests that if the wetland fill permit is approved by the Corps, additional, appropriate mitigation measures (in addition to those stated in the application) must be required by the applicant to protect the high value of the remaining areas of Turnagain Bog.

TCC TURNAGAIN BOG POSITION STATEMENTS: TCC has long advocated for preservation of Turnagain Bog, due to the high value functions it provides for the Turnagain area. TCC recently reaffirmed this position by including the below statements as part of our input to the draft Lake Hood Seaplane Base Master Plan currently in the process of being updated:

"Turnagain Community Council recommends designation of the remaining undeveloped Turnagain Bog wetlands and associated uplands as protected buffer areas, thus retaining high value functions related to water quality, hydrology, aesthetics, ground noise buffering, wildlife habitat and aircraft safety." (adopted March 5, 2015)

"Turnagain Community Council strongly opposes development projects located in Turnagain Bog land at the Airport, specifically the three projects identified in the [LHMP] Draft Plan:

- Tie-down GA parking and lease lot/tie-down space east of the Lake Hood gravel strip runway [identified as CIP Projects 10A, 10B, and 10C in the draft];
- Proposed trail east of the gravel strip near the Turnagain residential boundary [identified as Other Project J]; and
- **The tie-down GA parking lot west of the existing Echo tie-down parking lot [identified as Other Project K].** * (adopted April 7, 2016)

**Please note that the Draft Lake Hood Master Plan Update now out for public comment proposes General Aviation tie-down parking in the location where the Airport is proposing expansion of its Maintenance Facility under this fill permit application. TCC would appreciate written clarification from the Corps and/or applicant on this discrepancy.*

CUMMULATIVE IMPACTS: The wetland fill permit application request by the Alaska Department of Transportation & Public Facilities to fill 7.38 acres of Class “A” Turnagain Bog wetlands for expansion the existing Anchorage Field Maintenance Storage Yard located east of the U.S Post Office does not address an important issue that the Corps needs to take into consideration when evaluating the merits of the application — **the cumulative impacts of continued loss of the highest value wetlands remaining in the Anchorage Bowl** (according to the Turnagain Bog combined resource function value scores provided in the AWMP).

While the AWMP Management Strategies, Enforceable and Administrative Policies for Turnagain Bog “A” wetlands allows for development of these “A’ wetlands for airport location-dependent enterprises, they also state, **“Cumulative impacts shall be considered for future fill actions, as the bog has lost approximately 200 acres since 1996.”**

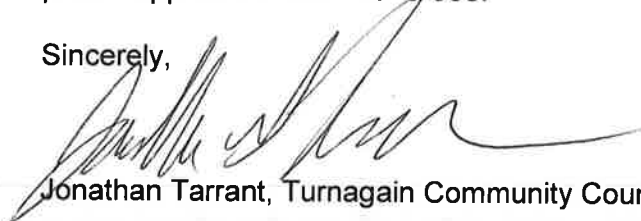
It is clear that wetlands in the vicinity of this proposal are drying out and vegetation is changing, due to cumulative wetland development in the Lake Hood Seaplane Base area. Also, negative impacts from fill and development of Turnagain Bog wetlands and associated uplands are not isolated and affect the water bodies connected to it in the Turnagain community — specifically, Hood Creek, Jones Lake, and Cook Inlet.

The fill permit application does not identify or address how the loss of wetlands and associated uplands and proposed fill and development will specifically affect/impact the hydrology, wetland vegetation, water quality and habitat in this area. Instead, the permit application only includes reasons why the fill can’t be avoided, and that during construction, Best Management Practices would be put in place.

MITIGATION: There is nothing in the application mitigation section that states how actual negative impacts to this wetland as a result of the fill proposal will be mitigated in the long-term, once construction is completed. Nor is there any mitigation proposals in the development application that addresses the net loss of high-value, Class “A” TB wetlands and the cumulative impacts to this wetland as a result of the fill. As stated at the beginning of this letter, if the permit application is approved, appropriate mitigation measures should be required, in order to protect remaining Turnagain Bog wetlands and their high value functions, which benefit our neighborhood.

Thank you for the opportunity to provide input on this important matter. In addition to our above requests, TCC would appreciate receiving from the Corps a copy of its decision regarding wetlands fill permit application POA-2016-500.

Sincerely,



Jonathan Tarrant, Turnagain Community Council President