
Turnagain Community Council

Cathy L. Gleason, President

c/o Federation of Community Councils

1057 W. Fireweed Lane, Anchorage, Alaska 99503

tccpresident@yahoo.com | cathy.gleasantcc@yahoo.com | 907-248-0442

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RE: West Anchorage Snow Disposal DRAFT Site Selection Study

Dear West Anchorage Snow Disposal Site Project Team:

Thank you for the opportunity to provide input on the West Anchorage Snow Disposal Draft Site Selection Study (Draft Study) prepared for the Municipality of Anchorage (MOA) Project Management and Engineering Department (PM& E). Turnagain Community Council (TCC) has reviewed this document and is respectfully requesting consideration of the following comments.

➤ Review/Compliance of Municipal Planning Documents Lacking in Draft Study

After initially considering 19 potential sites for an MOA snow disposal site in West Anchorage, the Site Selection Process outlined on page 7 of the Draft Study states, "Once an inventory was developed for initial site identification, each site was evaluated based on desired site characteristics to define the most suitable for further analysis." The Draft Study ultimately recommends **Site #5: Connor's Bog for a West Anchorage snow disposal facility** (pages ii & 22). *However, this process did not include a very important step: with the exception of selective reference to the Anchorage Wetlands Management Plan, the process did not include assessment of the sites for compliance/conflicts with adopted Municipal land use/planning documents.*

Specifically, when evaluating **Site #5: Connor's Bog** for a West Anchorage snow disposal facility, the Draft Study did not determine whether this site is compatible with multiple adopted Municipal land use planning and policy documents that generally fall under the umbrella of the 2020 Anchorage Bowl Comprehensive Plan. While acknowledging that this site is located in Class A wetlands, the Draft Study comes to the conclusion that "**#5: Connor's Bog Site** is a very desirable snow disposal site... and has few drawbacks." (page 15).

TCC strongly disagrees with this conclusion, based on important Municipal plans that clearly identify Connor's Bog as a high value natural open space that provides important values and functions for the west area of our community — and that these Class A wetlands should be preserved in their current, undeveloped state.

These documents include:

- **2020 Anchorage Bowl Comprehensive Plan** (adopted 2001)
 - Conceptual Natural Open Space Map identifies area of **Site #5: Connor's Bog** as **“Community Preference for Natural Open Space,”** (*identified by the public*) and **“Important Wildlife Habitat”** (*identified by local wildlife experts and scientific reports*) (page 63)

- **Anchorage Park, Natural Resource & Recreation Facility Plan** (adopted 2006)
 - Map 6: Natural Resource Use Areas designates area of **Site #5: Connor's Bog** area as **"Municipal Park Lands"**
 - Appendix B (pages 10-11): Class A wetlands are included in the category of **“Natural Resource Preservation Land,”** and are defined as **“Those areas that perform important environmental functions and have high ecological values”** and **“...should be permanently dedicated as NR Preservation Lands that can only be altered by a 60 percent vote of the community.”**

- **West Anchorage District Plan (WADP)** (adopted 2012)
 - Exhibit 2-13: Parks and Open Space map designates **Site #5: Connor's Bog** area as **"Parks"**
 - Exhibit 2-14: Wetlands Classifications and Coastal Zone Boundary map designates **Site #5: Connor's Bog** area as **"Class A (High Value)"**
 - 2.5 Park, Recreation, and Open Space section states, **“The Southwest Parks District...has a large concentration of Natural Resource Use areas (areas designated for preservation rather than public use).”** This includes the **Site #5 Connor's Bog** area (page 49)
 - Exhibit 4-1b: Sand Lake Land Use Detail designates area of **Site #5: Connor's Bog** area as **"Class A (High Value)"**
 - Under **“Parks Objective #4 Manage, protect and enhance municipal parks, greenbelts and natural open space areas (including riparian and wildlife corridors) that support fish and wildlife habitats and wetland functions.”** This section states, **“The WADP recommends that high-value wetland parcels to be retained or acquired for permanent protection. Wetlands owned by the Municipality [which includes Site #5: Connor's Bog], should be preserved with a conservation easement or transferred to an appropriate public agency for long-term preservation and management.”**

- **Anchorage Wetlands Management Plan** (adopted 2014)
 - Figure 4: Wetlands Designations/Anchorage Bowl – Southwest designates **Site #5: Connor's Bog** area located within **Parcel #34** as **Class “A” Wetlands**
 - Table 4.1 Anchorage Bowl Wetland Designations, Enforceable and Administrative Policies, and Management Strategies states as an **Enforceable Policy for Site #34 CONNOR'S-STRAWBERRY BOG: “Municipal lands within Connor's-Strawberry bog shall be managed for open space, wildlife habitat, and wetland functions.”** It also scores this wetland high in Hydrology (114); Habitat (138); Species (98); Social Function (80), and describes the area as **“Significant waterbird migratory and nesting habitat complex.”** (page 52)

- **2040 Anchorage Land Use Plan** (adopted 2017)
 - Anchorage 2040 Land Use Plan Map identifies **Site #5 Connor's Bog** area as **“Park or Natural Area”** (Not **“Community Facility or Institutions”**)
 - Park or Natural Area section of Plan states this land designation **“provides for active and passive outdoor recreation needs, conservation of natural areas** and greenbelts and trail connections.” (page 51)

- The Anchorage 2040 Land Use Plan Gallery Community Natural Assets identifies **Site #5 Connor’s Bog area as part of a “Natural Asset Hub”** (one of 6 Hubs within the Anchorage Bowl), **“Class A Wetlands,”** and an **“Open Space and Important Habitat Intersect”** (MOA website)

Over the years, TCC provided significant input during the development of each of the above specific Municipal plans. These important land use planning documents reflect expectation by the public, including TCC, that important natural open spaces, including the municipally-owned portions of Connor’s Bog, would be permanently protected. At no time during the development of the above plans was construction of any Municipal or private facility that would significantly and negatively impact this area ever proposed or considered. Lack of any reference in the Draft Study to Municipal planning, implementation, and enforcement policies outlined above raises serious questions about the Draft Study’s methodology and evaluation as to whether Site #5: Connor’s Bog is an appropriate, or even allowable, location for a snow disposal facility. Unfortunately, the Draft Study minimizes significant development impacts, which results in delegitimizing the Draft Study’s conclusion that Site #5: Connor’s Bog “has few drawbacks.”

➤ **Long-Term MOA Use of Snow Disposal Site at the Airport**

As referenced in the Draft Study (pages 1 & 3), the existing snow disposal site located on state land managed by the Ted Stevens Anchorage International Airport (Airport) has been used for West Anchorage Snow Service Area snow storage under short-term leases between MOA and the Airport. In the past, the MOA was unable to negotiate a long-term lease agreement that would allow the city to make required operational improvements, including those related to treatment of discharge from the site and water quality requirements due to its location in the area hydrologically connected to the Connor’s Bog wetlands and drainage into those wetlands. This unresolved Airport-MOA long-term land use agreement has now resulted in the need for a new snow disposal facility site selection study.

Unfortunately, the Draft Study did not put more emphasis on potential resolution of this issue before dismissing the option of a long-term Airport-MOA agreement. Instead, the Draft Study focused on identifying potential news sites for a new facility.

Despite its shortcomings, the MOA has applied for another short-term lease with the Airport for use of the existing snow disposal facility (ADA32308). Assuming this lease is approved, the city will have the use of this Airport snow disposal site for the 2020-2021 winter season.

While the Airport-owned site is located in the Connor’s Bog area, there are two important distinctions with regard to the use of it as a snow disposal facility by the Municipality:

- 1) MOA land use documents do not have the same natural resource preservation directives on the state-owned snow facility area within the Airport boundaries. For example, it is designated as “Major Transportation Facility” (the general category for all Airport property) in the *WADP*.
- 2) More significantly, contrary to the Draft Study’s assertion that, “Due to future plans for the site, a long-term lease or purchase option [with the Airport] is not available” (page i), the *Ted Stevens Anchorage International Airport 2014 Master Plan, Appendix K – Airport Layout Plan*, does not indicate any future plans for this site — other than the existing snow disposal facility. There also

appears to be adequate land for enlarging the site to the required snow disposal facility acreage identified in the Draft Study (page 6).

- 3) And most importantly, the **“ON-AIRPORT LAND USE PLAN** (Appendix K, page 32 of 34) **designates the larger Airport land parcel east of Runway 7L-25R as “Non-Aeronautical.”** This important designation allows for Municipal uses, including the existing snow disposal facility and the Connor’s Lake Park area for passive public recreational use.

Instead of moving forward with developing a new snow disposal facility in Site #5: Connor’s Bog, **TCC requests that the MOA and the Airport revisit executing a long-term lease that will enable continued MOA use and development of needed improvements of the existing snow disposal site.** This much-preferred option would allow for needed MOA operational improvements in a manner that meets water quality regulations and other requirements, while eliminating the need to develop an additional snow disposal site in MOA-owned Connor’s Bog Class A wetlands, and avoiding significant and cumulative negative impacts to water quality, hydrology, natural open space and wildlife habitat in the larger Connor’s Bog area owned by the Municipal.

How might that be accomplished? Having been part of previous discussions regarding Municipal use of Airport lands, key individuals were not part of the process, including the current Alaskan governor or our U.S. Congressional delegates. **TCC recommends prompt Airport, Municipal and community engagement with these individuals (as well as West Anchorage State legislative officials),** who have the influence and ability to direct the Airport sign a long-term lease with the Municipality for use of the current snow disposal facility — with required improvements — on State land. *This “non-aeronautical” use would:*

- 1) *Conform to the Airport Land Use Plan;*
- 2) *Is permitted by FAA regulations; and*
- 3) *Would meet the needs of the MOA to provide an important snow disposal service for the West Anchorage community.*

➤ **Mitigation Requests If Site #5: Connor’s Bog is Developed**

If TCC’s request and recommendations are not acted upon, and the MOA moves forward with selecting Site #5 Connor’s Bog for development of a snow storage site — despite nonconformance with multiple Municipal land use documents — TCC is concerned about potential water quality, hydrology, wildlife habitat, aesthetics, and other impacts to the Connor’s Bog complex.

The below (and potentially other) measures would be far more appropriate for mitigating the snow disposal facility on Municipal lands than improving the Connor’s Bog Dog Park parking area, which is referenced as mitigation on page 22. While it’s something to consider, this alone would be completely inadequate to compensate for impacts that would be sustained on Class A wetlands, if the snow disposal site is developed at Site #5: Connor’s Bog.

If Site #5: Connor’s Bog is developed, TCC recommends comprehensive mitigation be required, including the following:

- Reduce overall acreage footprint of facility, as the Draft Study does not provide justification for use of 32 acres of Connor’s Bog wetlands when it states, “The 15-acre size leaves adequate area for access roads, berms, water quality structures, screening, and property line setbacks.” (page 6)
- Limit fencing and other constrictions that inhibit wildlife movement
- Provide for visual buffering from Minnesota Dr. that does not impede appropriate hydrology
- Require measures that would maintain natural drainage patterns and all other enforceable policies in the Anchorage Wetlands Management Plan
- Permanently preserve as a condition of developing Site #5: Connor’s Bog all remaining Municipally-owned Class A wetlands tracts within the Connor’s Bog wetlands through dedicated parkland status or other appropriate measures, such as conservation easements, that would restrict future development — and concurrently rezone this land to PR District
 - This would specifically conform to Municipal planning management strategies for remaining MOA-owned Connor’s Bog Class A wetlands referenced above in our comments
- Conduct ongoing monitoring of remainder of the Connor’s Bog wetland complex as part of the conditional use permit, to ensure operations of the snow disposal facility are not adversely affecting bird nesting, wildlife movement, hydrology/water quality of wetlands, etc. in the remainder wetlands complex
- Provide an opportunity to address the Parks and Recreation Advisory Commission regarding this project proposal, as West Anchorage community councils were not notified of this item on their September 10, 2020, agenda. TCC feels it was premature for the Commission to support use of Site #5: Connor’s Bog for a snow disposal facility without public input/testimony on this significant proposal on Municipally-owned Class A wetlands

Turnagain Community Council sincerely appreciates the work done to-date on the West Anchorage Snow Disposal Draft Site Selection Study — and the generous timeline provided to submit our comments. We hope you seriously consider the above comments, recommendations and requests before finalizing the document. Please let us know if you have any questions or need clarification about our comment letter.

Best Regards,

Cathy Gleason
Turnagain Community Council President