
TURNAGAIN COMMUNITY COUNCIL

c/o Federation of Community Councils
1057 West Fireweed Lane, Suite 100
Anchorage, Alaska 99503

TO: Brandon Tucker, Airport Leasing Program Manager
Ted Stevens Anchorage International Airport
FROM: Turnagain Community Council President Anna B. Brawley
DATE: June 30, 2022
RE: **Lease Agreement ADA-32299 Federal Express Corporation** re: 55-year lease

Sent via Email

Mr. Tucker,

Thank you for the opportunity to provide written comments on lease application ADA-32299, submitted by Federal Express Corporation (FedEx). These comments reflect concerns that Turnagain Community Council (TCC) members have expressed consistently about proposed lease applications and development located at Ted Stevens Anchorage International Airport (Airport) North Airpark property, including land west of Postmark Dr. within Postmark Bog wetlands. TCC also proposes mitigation strategies to reduce impacts on the nearby residential and natural areas.

1. Proposed Site in Class A Wetlands
2. Water Quality/Hydrology Impacts; PFAS Contaminates
3. Air Quality/Odor of Jet Fumes Impacts
4. Ground Noise Impacts
5. Heavy Cargo-Related Truck Traffic on West Northern Lights Blvd. (WNL) Through the Turnagain Residential Area
6. Cumulative Impacts of Development at North Airpark
7. Potential Mitigation' to Address Impacts

1. Proposed Development Class A Wetlands

The expansion of the current FedEx facility, which will include a domestic operations center, infrastructure and improvements to support the applicant's warehouse operations as well as aircraft and vehicle parking, is proposed to be located within the Postmark Bog wetland complex, identified in the *Anchorage Wetlands Management Plan*, July 2014 (AWMP), page 52, as "Site # 26D — POSTMARK DRIVE WEST."

The AWMP classifies this wetland as "Class A," the highest wetland value designation. The plan also includes an Enforceable and Administrative Policy included in the 2014 description: "Cumulative impacts shall be considered for future fill actions, as the bog has lost approximately 27 acres (1/3 of its size) since 1996."

Considering there are already multiple cargo facilities at North Airpark, there is good reason to believe there have been substantial cumulative impacts to Postmark Bog. TCC recently submitted similar comments on the proposed Alaska Cargo and Cold Storage facility lease application about these concerns.

2. Water Quality & Hydrology:

Turnagain Bog is also a Class A wetland area in the AWMP (Site #26A & 26B, page 51), adjacent to Postmark Bog, and these two wetlands have inter-related hydrology, with multiple water bodies including ponds and creeks.

The Airport has stated that PFAS (per-and polyfluoroalkyl substances) contaminants have been identified in Postmark Bog. The accumulation over time in the environment, and in bodies of animals and people, pose definite health and environmental exposure risks, particularly given the connectivity to Turnagain Bog.

Runoff from daily, routine cargo-related operations like those occurring at the proposed FedEx facility expansion have the potential to contribute to the degradation of water quality within the adjacent wetlands and into runoff that flows into Cook Inlet.

Wetlands perform natural filtration functions to protect water quality in the vast Postmark Bog/Turnagain Bog complex, and ultimately in Cook Inlet. As more wetlands in this area are filled, the remainder of wetland and waterbody water quality is likely adversely impacted in these important areas within the TCC boundaries.

Furthermore, as more wetlands are filled, the remainder of wetland and waterbody viability will continue to be adversely impacted due to reduced water flow that will degrade Turnagain Bog and the connected waterbodies' value and functionality.

3. Air Quality/Odor of Jet Fumes Impacts

Turnagain residents have long been exposed to jet fume smells at their homes, generated from cargo-related activity at the Airport, including North Airpark, where the FedEx expansion development is being proposed.

It is widely recognized by the medical community that jet fuel exposure can cause a wide range of health problems. With development of additional cargo-related operations in North Airpark — including the proposed FedEx expansion as well as the proposed Alaska Cargo and Cold Storage facility — cumulative and negative health impacts to our air quality, and inhalation and exposure to jet fumes, will likely increase with more development, and needs to be addressed.

4. Ground Noise Impacts

Turnagain residents have also experienced a significant and cumulative increase in cargo plane-related ground noise. This has been a long-term concern of the community as the Airport has grown over time, and as more development encroaches on natural buffers to adjacent neighborhoods, such as wooded areas. TCC is concerned about further increases to ground noise as a result of this and other developments, and these cumulative impact needs to be addressed.

5. Freight Truck Traffic on West Northern Lights Blvd. (WNL) Residential Corridor

Turnagain residents have also seen a **significant increase in airport-related traffic on West Northern Lights Blvd.**, including a major increase in freight truck traffic documented by residents

beginning in 2018 (this coincides with unexplained removal of thru-truck weight limit signage on WNL). This corridor includes Turnagain Elementary and several residential subdivisions, and has become less safe as more large trucks use this road during day and night hours, and travel at unsafe speeds next to bike and pedestrian facilities. Residents also complain about fumes and shaking when these large trucks travel right past their homes. TCC is concerned about additional construction and operations traffic from more cargo development like those proposed at North Airpark, and these health and safety impacts need to be addressed.

6. Cumulative Impacts of the Proposed FedEx Expansion, Existing and Other Proposed Development At North Airpark

Activity from the Airport and related-uses currently causes significant impacts to surrounding residential neighborhoods, recreational assets, and natural open space/wildlife habitat.

Over the last few years, the Airport received five, large cargo-related development proposals, including the FedEx expansion facility. When considering lease approval for the FedEx expansion, the Airport must consider all of these proposed leases as a whole, and the increase in cumulative impacts these cargo-related projects would impose on the neighborhood and nearby natural areas — rather than consider each one independent of the rest.

The Airport’s approval, and resulting construction, development and operations, of some or all of the cargo-related projects — including at North Airpark — would significantly increase the above-stated negative impacts to adjacent land uses in the TCC area. ***The increased cumulative impacts remain a significant concern to our community.***

7. Proposed Mitigation To Help Address Cumulative Impacts:

Cumulative impacts from cargo-related development at North Airpark have been substantial; the FedEx expansion facility Alaska will pose additional impacts that need to be addressed before this lease application is approved.

TCC’s Recommendations:

- 1. Requirement that the Environmental Assessment evaluate not only impacts from this proposed facility, but also resulting cumulative impacts** of this and other existing and proposed developments, such as: filling “Class A” wetlands; PFAS contaminants; measurement and monitoring of air quality in surrounding residential areas; and measurement and monitoring of ground noise in surrounding areas.
- 2. Install an earthen berm with evergreen landscaping along the west side of Postmark Dr.**, extending the existing berm from the south end of Postmark Dr. to the existing FedEx facility, and including the eastern portion of the site proposed for lease. Installation of a permanent berm would help mitigate ground noise exposure impacts to the residential areas as more development is proposed and approved at North Airpark. The EA for this development should also address impacts (i.e., filling of wetlands) of this berm development.

Turnagain Community Council

An alternative to consider: Exclude land needed for the above described berm from both the FedEx expansion and the Alaska Cargo Cold Storage lease applications, which would ensure consistency of the berm design and construction timeline.

- 3. Include in the lease a condition prohibiting heavy freight truck traffic on West Northern Lights west of Minnesota Dr.,** including both construction and operations, and instead use of International Airport Road to access their destinations.

Again, thank you for the opportunity Turnagain Community Council to provide comments on lease application ADA-32299, submitted by Federal Express Corporation at Ted Stevens Anchorage International Airport. TCC asks the Airport. TCC asks the Airport to give full consideration of our input and mitigation requests. Please don't hesitate to contact the Council, if you have any questions.

Sincerely,



Anna B. Brawley
Turnagain Community Council President

Cc:

Interim Airport Manager Craig Campbell
Mr. John Johansen
Ms. Teri Lindseth
Sen. Mia Costello
Rep. Matt Claman
Mayor David Bronson
Assembly member Austin Quinn-Davidson
Assembly member Kameron Perez-Verdia
Sand Lake Community Council President
Spenard Community Council President