

TURNAGAIN COMMUNITY COUNCIL

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

TO: Karin Bouler, RS&H

FROM: Turnagain Community Council, Acting President Cathy L. Gleason

DATE: March 2, 2023

RE: Scoping Comments on Environmental Assessment for Expansion of FedEx Facility at Ted Stevens Anchorage International Airport

Dear Ms. Bouler:

The Turnagain Community Council (TCC) appreciates the opportunity to submit scoping comments on the Environmental Assessment (EA) for expansion of the FedEx Facility at Ted Stevens Anchorage International Airport (TSAIA). TCC previously submitted comments June 30, 2022, on the TSAIA Lease Agreement ADA-32299 Federal Express Corporation RE: 55-year lease; a hard copy of our comments was provided to RS&H at the scoping meeting in Anchorage on February 16, 2023. Jon Isaacs, Steve Montooth, and Jean Bielawski – TCC members – attended the scoping meeting and had discussions with RS&H staff.

Understanding of the Scope of Expansion

Information on the nature of the proposed Fed-Ex expansion was not evident from project poster boards presented at the February 16th meeting. Based on discussion with RS&H staff, TCC members were told the following:

- The proposed project relocates existing propeller-driven aircraft that serve communities in Alaska and are currently operating behind the main facility.
- It does not increase the hours of operation, the number/type of aircraft or trucks supporting the current operation.
- However, it does relocate those existing aircraft farther to the east and adjacent to Postmark Drive, which means that aircraft noise may be more noticeable to Turnagain neighborhoods.

PFAS Contamination/Class A Wetland Fill Mitigation

TCC members talked to RS&H at the project scoping meeting about PFAS and other contamination at the proposed expansion site. They were told that sampling has been done at Postmark Bog site and it was determined that there is a PFAS plume moving east towards Postmark Drive. There is a proposal to install a carbon remediation system in the ground adjacent to Postmark Drive, but no detail was provided on how it works. At the meeting, they suggested that a runoff collection system be incorporated to prevent deicing fluid and other potential contaminants from flowing off-site and into the adjacent Class A Turnagain Bog wetlands and groundwater system.

Finally, because the proposed expansion is located within Postmark Bog wetlands, TCC members asked what is being considered as part of the wetlands fill permit process to minimize and mitigate filling in Class A wetlands. (Of course, FedEx's proposed expansion, in conjunction with the proposed Alaska Cargo Cold Storage development, will essentially fill the entirety of the remaining Postmark Bog wetlands.) RS&H responded that they are currently working with the Alaska District Corps of Engineers. They were aware of the comments that TCC Vice President Cathy Gleason had submitted in August 2022 on the Alaska Cargo Cold Storage wetland fill permit — this proposed development would be located directly adjacent to the FedEx expansion project in Postmark Bog.

Area of Impact Analysis

TCC has serious concerns regarding the potential for both on-airport and off-airport impacts from the proposed FedEx expansion, particularly with regard to the following:

- 1) Increased ground noise levels in Turnagain neighborhoods adjacent to TSAIA;
- 2) Increased Airport-generated heavy truck traffic on West Northern Lights Blvd. through the Turnagain residential neighborhood;
- 3) Existing PFAS and other contaminants on-site, such as deicing fluids and run-off from routine cargo-related operations — and the potential for additional contamination of the adjacent Turnagain Bog Class A wetlands;
- 4) Filling remaining Postmark Bog Class A wetlands, and resultant hydrological impacts to Turnagain Bog, Jones Lake and Hood Creek;
- 5) Increased air quality degradation and odor exposure to nearby public parks, trails, open space and residential neighborhoods; and
- 6) Proposed FedEx development expansion contributing to even greater *cumulative impacts* that Turnagain neighborhoods and natural areas are already experiencing from Airport development in general — and, specifically, from the continued increase of development and operations of Airport cargo facilities in North Airpark/Postmark Bog.

Due to the above significant concerns, TCC requests that the Environmental Assessment area of cumulative impact analysis include a broader geographical footprint, i.e., adjacent Turnagain neighborhoods, parks, natural open space and road systems, as well as high value wetlands, other water bodies (Jones Lake, Hood Creek) and groundwater systems adjacent to the expansion site and north/northeast to Cook Inlet.

Issues and Potential Impacts to be Addressed in the Environmental Assessment

As indicated above, there are six issues/impacts of concern TCC has identified that must be addressed in the EA conducted as part of the FedEx cargo facility expansion approval process:

- 1) Increased Ground Noise Levels in Turnagain Neighborhoods Adjacent to TSAIA

Turnagain residents have 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 cargo-related development has encroached on natural buffers on Airport land adjacent to neighborhoods, including naturally wooded areas. TCC is concerned about exposure to further increases in ground noise as a result

of the FedEx expansion operations and other proposed developments in North Airpark, and these *cumulative impacts* need to be addressed. Even though this expansion project may not increase the existing level of prop-driven aircraft operating at FedEx, the proposal to *move these operations closer to adjacent Turnagain neighborhoods* will likely *increase* the noise levels heard in these areas.

MITIGATION: To help mitigate the *increasing and cumulative* ground noise generated by Airport/North Airpark facility operations, TCC requests that an earthen, landscaped berm or other, similar noise barrier be constructed along the west side of Postmark Drive and east of the proposed aircraft operating area of the FedEx development expansion. (TCC has also requested this ground noise mitigation berm as part of the Alaska Cargo Cold Storage facility development along Postmark Dr., if approved, and coordination between these two developments must be required, to ensure consistency in design and functionality.) TCC also requests that mitigation include permanent retention of large, wooded areas that still exist between the Airport and the Turnagain neighborhood, to provide important natural noise buffering from increasing ground noise impacts.

2) Increased Heavy Cargo-Related Truck Traffic on West Northern Lights Blvd.

Turnagain residents have also seen a *significant increase* in vehicle traffic on West Northern Lights Blvd. (WNL) from commuters and operators at North Airpark, including a *major increase* in freight truck traffic documented by Turnagain residents. This road corridor — which was designed and built to *Neighborhood Collector standards* from Wisconsin St. westward — 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, and travel at unsafe speeds directly adjacent to bike and pedestrian facilities.

Residents also complain about exposure to truck diesel exhaust and homes shaking when these large trucks travel right past their homes. TCC is concerned about increased freight truck traffic impacts from additional cargo development proposed at North Airpark, including the FedEx expansion project, and these *significant health and safety impacts* need to be comprehensively addressed.

MITIGATION: It remains to be seen if the proposed FedEx expansion will generate *additional* heavy truck traffic levels and hours of operation that could further impact residents, their homes, and users of the adjacent multi-use trail and sidewalk along WNL in the Turnagain neighborhood; *this is something the FedEx project expansion EA needs to assess.*

Regardless, to address the increasing and *cumulative* health and safety risks posed by North Airpark-generated cargo truck traffic traveling on a section of road located in an almost exclusive neighborhood area, any large truck traffic generated by FedEx/associated business operations *should be required to use International Airport Road — and prohibited from traveling on the section of WNL located within the Turnagain neighborhood.*

And, if more jobs are being created with this FedEx facility expansion, there will likely be additional commuter traffic using WNL at all hours of the day/night, which will also have negative impacts associated with the level of traffic on this section of WNL; *the EA should take this into consideration.*

3) Existing PFAS and Other Contaminants That May Be Generated On-site, Such as Deicing Fluids and Run-off From Routine Cargo-Related Operations

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, *cumulative* health and environmental exposure risks, particularly given the connectivity to Turnagain Bog. Runoff from daily, routine cargo-related operations like those currently occurring at the existing FedEx facility — and also would occur at the proposed facility expansion — have the potential to contribute to greater degradation of water quality within the adjacent wetlands, Jones Lake and Hood Creek, and into runoff that flows into Cook Inlet.

MITIGATION: The EA should evaluate and require installation at the FedEx expansion facility systems that have been proven to successfully contain and recover contaminants generated on-site, such as deicing fluids and routine operations runoff — as well as on-site systems that could be used to safely intercept and contain PFAS at the FedEx facility. This could include utilization of a carbon remediation system or other proven manner to capture PFAS contaminants currently found in Postmark Bog under the proposed FedEx expansion development site. *This is essential to ensure that these toxic substances do not migrate into important wetlands and other waterbodies at the Airport, within the Turnagain neighborhood, and into Cook Inlet.*

4) Filling Remaining Postmark Bog Class A Wetlands and Resultant Hydrological Impacts to Turnagain Bog, Jones Lake and Hood Creek

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."

Taking into account not only the proposed FedEx facility expansion development, but also the adjacent proposed Alaska Cargo Cold Storage Facility, *both within the Postmark Bog wetland complex, the entire remaining Postmark Bog footprint will be filled and developed.* Not only does this destroy these Class A wetlands in their entirety, but from a hydrological perspective, it will have significant impacts on the hydrological

viability of the adjacent Turnagain Bog wetlands, Jones Lake and Hood Creek.

MITIGATION: The EA must evaluate whether the proposed FedEx cargo facility expansion complies with the Anchorage Wetlands Management Plan Enforceable and Administrative Policy, as stated above. The project's direct, indirect, and *cumulative* impacts — including filling a significant portion of the remaining Class A Postmark Bog wetlands for this proposed FedEx expansion AND the remaining Postmark Bog wetlands that would be filled for the proposed Alaska Cargo and Cold Storage facility, if developed, must be comprehensively identified and addressed. One specific request TCC has put forth is to require **on-site mitigation** (typically not required for Airport wetlands), *requiring permanent preservation of remaining nearby Class A Turnagain Bog wetlands within the TSAIA boundaries*. This level of mitigation is warranted, considering the substantial consequences of filling the remaining acreage of Postmark Bog at the Airport.

In addition to the other *cumulative* impacts identified in these TCC comments, the EA needs to evaluate the *hydrological impacts* as they pertain to the adjacent Turnagain Bog wetlands and other associated waterbodies already mentioned — and include specific actions/requirements that would be required to avoid, minimize, or mitigate hydrological impacts and assure long-term viability of connecting high-value wetlands and connecting waterbodies.

5) Increased Air Quality Degradation and Odor Exposure to Nearby Public Parks, Trails, Open Space and Residential Neighborhoods

Turnagain residents have become all too familiar with exposure 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 comprehensively addressed.

MITIGATION: Requirement of permanent air quality monitors (and regular reporting to TCC and other public entities) in key locations at the North Airpark complex as well as locations in West Turnagain neighborhoods, Earthquake Park, and Turnagain Elementary School (or nearby location) is essential to determine jet fuel and other Airport-generated toxin exposure levels from operations at existing facilities as well as additional proposed development, including the FedEx cargo facility expansion. Strong mitigation consideration should include a requirement by the Airport to permanently retain large, wooded areas that still exist between North Airpark and the Turnagain neighborhood, to help absorb carbon dioxides — as well as continue to provide important natural buffering from increasing ground noise impacts, as mentioned above.

6) Overall Project Contributions to Cumulative Impacts that Turnagain Neighborhoods are Experiencing from Airport Development and Operations

Activity from the Airport currently causes significant impacts to surrounding residential neighborhoods, recreational assets, and natural open space/wildlife habitat. Development and operations from North Airpark cargo facilities are especially impactful to the nearby Turnagain neighborhood and public areas where people recreate (including the Nationally-recognized Tony Knowles Coastal Trail), and where urban wildlife habitat exists. 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 of Turnagain residents.

Again, thank you for the opportunity for Turnagain Community Council to provide scoping comments on the Environmental Assessment for expansion of Federal Express Corporation operations at TSAIA. TCC asks that TSAIA and FAA give full consideration to our input and mitigation requests for the proposed FedEx expansion proposal — as well as 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 Airport-related impacts that continue to threaten our neighborhood quality of life, health and safety — and potential mitigation requirements/actions TCC has requested, in more detail.

Sincerely,

Cathy L. Gleason
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