

Turnagain Community Council
Board of Directors
C/o Cathy L. Gleason, President
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October 4, 2013

sent via e-mail

Mr. Evan Pfahler
Project Manager
Reynolds, Smith and Hills, Inc.

Ms. Katherine Wood
Public Involvement Lead
HDR, Inc.

Re: Turnagain Community Council Comments on Ted Stevens Anchorage International Airport Master Plan Update Draft Phased Development Plan

Dear Mr. Pfahler (Evan) & Ms. Wood (Katherine):

Thank you, once again, for the opportunity to comment on the Ted Stevens Anchorage International Airport (ANC) Master Plan Update. Please accept the below comments and requests on behalf of the Turnagain Community Council (TCC).

⇒ ***Based on the council's previous input and long-held positions, TCC supports the essence of the Phase 1 Proposal (with an important exception explained on page 2) for inclusion in the 20-Year Airport Master Plan Update Final Development Plan.***

As stated in our previously submitted comments, overall, the proposals in Phase 1 would not only "Minimize Development," but also best serve our community by minimizing negative impacts associated with Airport development and operations to the surrounding community, including the Turnagain neighborhood and recreational/natural open space assets in West Anchorage. It would also provide sufficient, economically prudent and appropriate Airport functionality in the foreseeable future.

Take-off and landing capacity has been presented as the key determinant of each proposed Phase. With cargo traffic down 25 percent from its peak several years ago (and lower this year than in 2012), it is unlikely that the proposals in Phases 2-4 will need further consideration in this Master Plan Update and should be evaluated when the Airport Master Plan goes through another update process in five to seven years.

⇒ ***Particularly, the likely need for Phase 4 – Widely Spaced Runway (a second North-South Runway) is beyond the 20-year scope of this Plan Update and TCC requests that it be deleted in the Final Development Plan.***

Most elements of Phase 1 are also the most appropriate, given constraints that will affect the viability of the unconstrained forecast growth projections, as provided in the Alaska International Airport System Anchorage Forecast Summary (September 2012).

These **Forecast Constraints** include:

- Uncertainty of a stable global economy.
- Potential higher jet fuel prices.
- Economic viability of cargo carriers using direct Asia-to-Lower 48 cargo flights and other, non-aviation modes of transport.

- Uncertainty of future federal funding for major airport infrastructure projects.
- Potential for substantial airfare and user rate increases imposed by Signatory Airlines to cover their share of major ANC capital projects.
- Potential for substantial Airport rate increases in leasing, parking and other services and amenities to airport users, to cover additional infrastructure operation and maintenance expenses.
- Severe cumulative environmental and social impacts of potential ANC development expansion, including degraded water and air quality, destruction of natural open spaces and recreation assets, and additional air and ground noise.

By choosing to incorporate all the development proposals from 4 out of the 5 Draft Alternatives presented to the public last spring, the **cumulative impacts of the cargo-related development in North Airpark and the realignment of Postmark Dr. to the east will be substantial. Add the increased noise, and other social and environmental impacts to Turnagain from simultaneous take-offs to the north, if the second N-S runway is built, and the quality of life in our neighborhood will be highly compromised.**

By choosing an all-of-the-above development approach, the Preferred Master Plan Update Development Plan really is not a Master Plan for the next 20 years, but rather a “Wish List” for potential development that goes beyond the 20-year scope of this Plan Update and that does not include an analysis of economic or social trade-offs associated with the phased all-of-the-above development.

The Draft Phased Development proposal presented for comment is in the form of power point slides and is not in the form of a Master Plan analysis. Consequently, we cannot comment on the underlying justifications (i.e., “trigger points”) of the preferred phase developments, many of which extend beyond the planning horizon of 20 years. Consequently, we believe the Phased Multiple Development Alternative is a flawed approach.

⇒ ***In order to evaluate the feasibility of these Development Phases in a Master Plan context, TCC requests that the Airport conduct the following before the Development Plan is finalized:***

- A Noise Analysis of the impacts of simultaneous take-offs to the north from the existing and proposed new North-South Runway.
- A Noise Analysis of the **cumulative impacts** of locating North Airpark cargo-related development and a high truck-traffic road (Postmark Dr.) closer to the Turnagain neighborhood.
- An analysis by AKDOT&PF Traffic Engineering to identify safety measures for North Airpark traffic in the area of Postmark Dr. and the Airport Post Office, as alternatives that would have be less expensive and have fewer environmental and social impacts than relocating/realigning Postmark Dr. to the east in Turnagain Bog.
- An opportunity for the public to review a draft of the **entire Airport Master Plan Update document**, as has traditionally occurred in all previous TSAIA Airport Master Plan Update efforts. As stated above, until the public can review the underlying, detailed justifications and impacts of the phased development proposals that will be presented in the full document, the public cannot adequately respond to all the components of this Master Plan Update.

Cargo-Related Development at North End of North Airpark

All four development phases include potential air cargo expansion at the north end of North Airpark. TCC has opposed development in the remaining wooded areas south of Pt. Woronzof Dr. and the north end of North Airpark for many years. This remaining wooded area helps mitigate ground noise impacts by serving as a partial noise buffer between operations in the nearby aircraft engine run-up area and the Turnagain residential area to the east. The parcel also provides aesthetic, visual buffering along the road and Coastal Trail from North Airpark industrial development in this area.

⇒ ***TCC requests that the area at the north end of North Airpark be removed from potential air cargo development in the Final Development Plan.***

Turnagain Bog

Phases 2 and 4 propose relocation of Postmark Dr. to the east of its current location into remaining wetlands of Turnagain Bog. The preservation of all of the remaining Turnagain Bog wetlands and associated uplands as a natural resource and buffer between industrial and airport development and the local community has long been a major priority for TCC. Turnagain Bog provides important, high-value functions to our neighborhood, including wildlife habitat (identified as important wildlife habitat in the 2020 Anchorage Comprehensive Plan, page 63), water pollution filtration, downstream hydrology for Jones Lake, Hood Creek and Cook Inlet, air pollution absorption, and essential buffering for residential and recreational areas from airport development and operations.

The relocation of Postmark Dr. to the east would have significant environmental and social negative impacts, including the loss of important wetland functions and locating North Airpark high-impact operations and airport-generated traffic much closer to the Turnagain residential area (including the potential for airport-related development east of the relocated road, even though that is not shown on any of the Phased Development Plan maps).

⇒ *TCC requests that the remaining areas of Turnagain Bog be removed from potential relocation of Postmark Dr. to the east and potential air cargo and airline/airport support development east of the existing Postmark Dr. in the Final Development Plan.*

Postmark Bog

Because the decision was made during the evaluation of the Draft Alternatives over the summer months to incorporate all proposals from Alternatives 1, 2, 3 and 5, rather than choose one alternative, the **cumulative impacts of these multiple proposals are substantial** and we believe unwarranted.

Development Phases 1, 2 and 4 include development in the remaining portions of Postmark Bog west of Postmark Dr. TCC is currently providing input to the Airport's Part 150 Noise Study and has requested implementation of mitigation measures that will address existing and potential future Airport-generated ground noise impacts experienced in Turnagain from North Airpark operations.

While additional cargo development in Postmark Bog would not be without environmental and social impacts (including an increase in ground noise impacts) to the Turnagain residential area, these options are preferable to the potential expansion of similar cargo/airport development to the east of Postmark Dr. in Turnagain Bog, closer to our neighborhood.

⇒ *TCC supports identifying potential cargo-related development in Postmark Bog in the Final Development Plan, but development must be limited to areas east of the existing Postmark Dr. roadway.*

Additional North-South Runway

Phase 4 includes the potential development of a second "Widely Spaced" North-South Runway, which would have significant, negative impacts. TCC opposed the concept of a "Closely Spaced" North-South runway during the 2002 Master Plan Update process, and was joined by the Signatory Airlines and many others in the Anchorage community in opposing a "Widely Spaced" Runway proposal in 2008.

An additional North-South Runway would generate significant increases in aircraft take-off noise and air pollution emissions in the Turnagain residential area and nearby, popular recreational lands. Such a project will destroy sections of the **existing** Tony Knowles Coastal Trail and natural open space greenbelt buffers.

The second North-South Runway proposal in Development Phase 4 would create severe environmental impacts, including the destruction of Point Woronzof Park dedicated parkland and the northern area of the Anchorage Coastal Wildlife Refuge — both areas identified in the Anchorage 2020 Comprehensive Plan as important wildlife habitat (page 63). It would also destroy the only known Native archeological site in the Anchorage Bowl.

The entire city would be affected by the negative impacts a second North-South Runway could have on the Anchorage Water & Wastewater Utility's (AWWU) sewage treatment plant located at Pt. Woronzof, which now operates at the primary treatment level and relies on the outfall mixing zones in Cook Inlet. If required to treat at a secondary or tertiary level, AWWU's options for future plant expansion into its reserve land south of the facility would be severely limited.

For further, detailed discussion of the significant, negative impacts associated with a second North-South runway, see **Addendum beginning on page 6**.

The nearby community at large, along with TCC, has consistently opposed the development of a second North-South Runway — and any land exchange between the Municipality of Anchorage and the Airport that would transfer Point Woronzof Park, Coastal Trail greenbelt east of the AWWU Sewage Treatment Plant, or the AWWU sewage treatment reserve land to the Airport for development of another runway. The need for development of a second North-South Runway during the 20-year timeframe of the Master Plan Update is highly unlikely and any money spent toward this effort would be a waste of capital dollars on an unnecessary project.

⇒ ***As stated on page 1, TCC requests that the Phase 4 Widely Spaced Runway proposal be deleted from the Final Development Plan.***

Proposals Not Included in Draft Phased Development Plan

- TCC notes that none of the Phases in the Draft Development Plan for the 20-year Airport Master Plan Update proposes Airport-related development for Municipality of Anchorage Heritage Land Bank (HLB) land west of the Airport. This reinforces statements made by Airport officials in recent years during the development of the West Anchorage District Plan (WADP) — that this land is of little value to them for Airport development and expansion. As a result, this HLB land is not identified in the WADP (page 164) as a parcel of interest for the Airport to acquire in any potential land exchange with the Municipality.

⇒ ***TCC supports the exclusion of Municipal HLB land for any Airport-related expansion or development in the Final Phased Development Plan.***

- TCC also notes that none of the Draft Development Phases include proposed Airport-related development or expansion for areas currently used as parkland/or for recreation, or otherwise used and managed by the Municipality, including:
 - Little Campbell Lake
 - Coastal Trail, SW corner of E-W Runway
 - Coastal Trail, West Airpark Tract South of Pt. Woronzof Park
 - Coastal Trail, Eastside of Pt. Woronzof Bluffs
 - Spenard Beach Park
 - Northern area of Connor's Bog/Lake
 - East Section of Connor's Land-Snow Dump
 - DeLong Lake Park Parcel
 - Notch between FCC land and Little Campbell Lake
 - Raspberry Road Buffer
 - Kulis Road Buffer

⇒ **TCC supports the exclusion of areas long-used by residents and visitors for park/recreational purposes and an important Municipal snow dump area for any Airport-related expansion or development in the Final Development Plan.**

Due to the Turnagain neighborhood's close proximity to the Airport, and TCC's long-standing involvement in Municipal and Airport planning documents and projects that have potential impacts to our west Anchorage community — as well as assets important to the entire city of Anchorage — we hope that our input has been and continues to be given serious consideration as this public process continues and the Development Plan in the Airport's Master Plan Update is finalized.

On behalf of the Turnagain Community Council, thank you for the opportunity to comment on the Ted Stevens Anchorage International Airport Master Plan Update Draft Phased Development Plan. Please do not hesitate to contact me if you have any questions regarding the content of this letter.

Sincerely,

Cathy L. Gleason
President
Turnagain Community Council

Addendum Attached

CC:

State of Alaska Department of Transportation & Public Facilities Commissioner Patrick J. Kemp
State of Alaska Department of Transportation & Public Facilities Aviation Deputy Commissioner Steve Hatter
TSAIA Airport Manager John Parrott
TSAIA Director of Engineering, Environmental & Planning John Johansen
Alaska State Senator Hollis French
Alaska State Representative Lindsey Holmes
Alaska State Senator Berta Gardner
Alaska State Representative Harriet Drummond
Municipality of Anchorage Mayor Dan Sullivan
Anchorage Assembly Chair Ernie Hall
Anchorage Assembly Member Tim Steele
Municipality of Anchorage Community Development Department Director Jerry Weaver
Anchorage Parks and Recreation Department Director John Rodda
Heritage Land Bank & Real Estate Services Director Tammy Oswald
Municipality of Anchorage Senior Planner Thede Tobish
Sand Lake Community Council President Dan Burgess
Spenard Community Council President Robert Auth

Addendum to Turnagain Community Council October 4, 2013, Comment Letter on TSAIA Master Plan Update Draft Development Alternatives:

- **Additional N-S Runway Impacts to Tony Knowles Coastal Trail and Greenbelt/Buffer**

As stated in TCC's letter, Phase 4 includes the development of a second North-South Runway, which would have major impacts on the existing Tony Knowles Coastal Trail, one of the premiere recreational assets in Anchorage. As the Master Plan Update's own survey shows (Craciun Research Marketing

Research Study, April 16, 2013), almost 60 percent of those polled use the Coastal Trail around Point Woronzof, indicating the high usage of this area of the trail by Anchorage residents. Construction of another runway would destroy sections of the **existing** Coastal Trail and associated greenbelt/buffer and necessitate trail rerouting in undesirable ways that would severely degrade the trail user experience now enjoyed by our community.

The diagram associated with the Phase 4 proposal does not show development on a section of the existing Coastal Trail running through the Point Woronzof Overlook area and continuing south between the AWWU Sewage Treatment Plant and the Airport boundary to the east, near the existing North-South Runway — but it is likely the trail would be negatively impacted by the development of another runway in this area. There is a small, but significant trail/greenbelt in this southern trail section, strategically located between what would seem like two highly incompatible land uses for recreational use. However, this is a beautiful area of the Coastal Trail route, due to strategic planning in site location and topography, and the preservation of naturally wooded vegetation when the trail was built.

As illustrated in Phase 4, the impacts to the Coastal Trail running through Point Woronzof Park would be substantial. A large section of the trail in this scenic, natural Municipally-dedicated parkland area would be destroyed — and no conceivable rerouting of the trail (either tunneling it under the expansion infrastructure or running it around the filled area in the Anchorage Coastal Wildlife Refuge) — could adequately mitigate the high degree of negative impacts to the trail user experience and the loss of high-value natural open space/wildlife habitat that currently exists in this parkland.

The Coastal Trail running from downtown to Kincaid Park is a major tourist attraction as well as an important quality of life resource for residents. This past summer, the State and Municipality provided over \$800,000 in funding to rehabilitate the Coastal Trail and ensure its continued, long-term use. Rerouting the trail as part of Phase 4 would destroy its function as a recreational and park resource and result in a loss of quality of life for the residents of Anchorage and an economic loss in terms of the tourist-supported economy. In a January 2007 presentation to the Anchorage Park Foundation, University of Alaska Anchorage Economics Professor Steve Colt noted that the economic value to Anchorage of visitors staying in the Municipality for just one additional day to enjoy the Coastal Trail provides \$26 million in additional visitor spending each year. In 2012, hundreds of people signed a West Anchorage District Plan-related petition sponsored by the Turnagain Community Council, urging protection of the **existing** Coastal Trail and opposing trading the Coastal Trail in Municipal ownership (and Point Woronzof Park) to the Airport. With other cities spending millions to buy back their waterfront, we should protect our irreplaceable, high-value coastal parkland.

A second North-South Runway and its impact on the existing Coastal Trail would be contrary to the goals of the West Anchorage District Plan, which is to “**Acquire and permanently preserve** the Tony Knowles Coastal Trail as a well-maintained, contiguous, public recreation corridor with vegetative buffer from Kincaid Park to Westchester Lagoon.”¹ The Municipality would lose a significant section of the trail already in its ownership by trading away Point Woronzof Park and the trail to the Airport, which would allow implementation of Phase 4 – Widely Spaced Runway. The Airport has complete control over any sections of the trail on its property and could approve, at any time, to destroy the trail and replace it with aviation-related development — despite its verbal promise to maintain a contiguous trail.

- **Additional N-S Runway Impacts to Point Woronzof Park**

Phase 4 would require complete destruction of Pt. Woronzof Park “permanently” dedicated parkland. TCC played an integral role in the creation of this well-used, 191-acre, natural open space park, which was created by Municipal Assembly action in 1994 as a specific condition of approval to a Municipal-Airport land trade. TCC has advocated for its preservation since that time, with strong public support, including opposing any land trade between the Airport and the Municipality that would allow for Airport acquisition of Point Woronzof Park.

¹ Parks, Recreation, and Natural Open Space Implementation Action Parks Objective #6.

As stated above, a significant section of the Coastal Trail is located in Point Woronzof Park, which offers a natural environment setting that is highly valued by recreational users. This park also serves as an important wildlife habitat corridor as well as provides an essential greenbelt buffer between the trail and adjacent current and potential future high-impact Airport development and operations to the east. The Master Plan Update's survey (Craciun Research Marketing Research Study, April 16, 2013) indicates that over 45 percent of Anchorage residents polled use Point Woronzof Park. A vote of Anchorage residents would be needed to undedicated the park and allow for Airport acquisition of the parcel.

- **Additional N-S Runway Impacts to Native Archeological Site**

A second North-South Runway, as depicted in Phase 4, would also destroy an important Native archeological site, located near the AWWU Reserve land-Point Woronzof Park boundary west of the Airport. According to the Municipality of Anchorage Pt. Campbell-Pt. Woronzof Master Plan, March 1982, the Tanaina Archeological site is the only known archeological site in the Anchorage Bowl.

- **Additional N-S Runway Impacts to Anchorage Coastal Wildlife Refuge**

The placement of a massive amount of fill (one estimate is 58 acres) in the Anchorage Coastal Wildlife Refuge would be required under the Phase 4 runway addition scenario. This would destroy an area identified in the Anchorage 2020 Comprehensive Plan as important wildlife habitat. According to the Alaska State Department of Fish and Game (Anchorage Coastal Management Plan Program Document, June, 1987), these coastal wetlands have a unique vegetative community that attracts a variety of migratory birds. It is also a documented corridor for the federally listed Beluga whale endangered species swimming to Upper Cook Inlet feeding areas. At low tide, the refuge offers residents and visitors the opportunity to walk along the shoreline in the northern area of the refuge for recreational purposes and enjoy a spectacular view of our city's coastal environment. The fill and subsequent development would also severely compromise the stunning views enjoyed by many visitors as well as over 56 percent of Anchorage residents polled in April by Craciun Research at the popular Point Woronzof Overlook.

- **Additional N-S Runway Impacts on AWWU Sewage Treatment Plant Functions and Expansion**

As stated above, Phase 4's additional North-South Runway proposal would require the placement of a massive amount of fill in Cook Inlet, which could significantly alter the tidal mixing zones where the current sewage treatment outfall is located. Further jeopardizing the functionality of the treatment plant would be the Airport's acquisition of the AWWU reserve land south of the sewage treatment plant. This would result in limited options for facility treatment upgrades and expansion, including switching from primary to secondary or tertiary treatment, if mandated by the Environmental Protection Agency at some point in the future. The sewage treatment plant would likely need to be relocated, but according to a top AWWU official, there is no viable, alternate location within the Anchorage Bowl to relocate the treatment plant. TCC has opposed any land trade that would allow for Airport acquisition of the AWWU sewage treatment plant expansion parcel.

- **Additional N-S Runway Impacts on Point Woronzof Dr. — Access to Municipally-Owned Land**

Phase 4's proposed development of another North-South Runway, taxiway and significant cargo-related development in West Airpark could have negative impacts on Point Woronzof Dr. because of the necessity of connecting this new development to Taxiway Y. A new road that would be tunneled under the existing and proposed second North-South Runway infrastructure is proposed as part of Phase 4, to provide access to the newly developed areas as well as to Municipally-owned Heritage Land Bank land west of the Airport, where the Salvation Army Clitheroe Center is located. Depending on the level of potential restrictions that could be imposed on this road into significant airfield infrastructure and cargo/industrial development, the tunneled road alternative to the existing Point Woronzof Dr. could jeopardize future access to Municipal land, including the Clitheroe Center facility, which has long provided much-needed services to the Anchorage community.