

**Turnagain Community Council**  
**Mark Wiggin, President**

February 22, 2006

sent via e-mail

Ms. Diana Rigg  
Planning Manager  
Ted Stevens Anchorage International Airport  
PO Box 196960  
Anchorage, AK 99519-6960

**Re: Project No. 57175 — Draft Environmental Assessment for Echo Parking Project**

Dear Ms. Rigg (Diana):

Please accept the comments below from Turnagain Community Council's (TCC) on the Ted Stevens Anchorage International Airport (TSAIA)'s draft Environmental Assessment (EA) for Echo Parking Expansion-Phase II and Realignment of Aircraft Drive.

**I. CUMMULATIVE IMPACTS NOT ADDRESSED:**

As you are well aware, TCC has a long-standing objection to the development of more tie-down spaces at the Lake Hood General Aviation facility — especially any spaces located closer to our residential neighborhood due to air pollutants and noise generated by the operation of such a facility. TCC also opposes more filling of Turnagain Bog wetlands for several reasons: degradation of water quality; negative effects on hydrology of area waterways, including Hood Creek and Jones Lake, which are located in Turnagain; destruction of wildlife habitat; and removal of important spatial buffers between Turnagain and other major airport operations and development (including general aviation operations at the current Echo Parking lot, nearby GA lease lots, the gravel runway and cargo development to the west).

Additionally, the EA does not address the cumulative impact this development will have with the development anticipated in the GA Master Plan Draft Preferred Alternative. Under this draft, even more tie-down spaces at Echo parking and lease lots located closer to the Turnagain neighborhood are proposed. Because Echo Parking expansion Phase II has been pushed forward by TSAIA separate from and ahead of the completion of the GA Master Planning process, the EA fails to consider all of the additional GA development planned in the GA Master Plan and the cumulative negative impacts associated with it.

We feel the cumulative negative impacts of all airport projects, not just any one in particular, must be considered and evaluated when determining the validity of a project and its negative impacts to the community adjacent to it — especially since negative impacts from TSAIA on our community have increased dramatically during the last 15 years. Unfortunately, the EA for Project No. 57175 does not do this, as required by NEPA.

## **II. LACK OF JUSTIFICATION FOR NEED OF PROJECT:**

TCC does not believe the need for expanding Echo Parking and relocating a portion of Aircraft Drive has been demonstrated for this project. The statement of needs analysis does not demonstrate that there is a net need for more tie-downs at the Lake Hood facility. Firstly, as the FAA points out in its recommendation concerning differential pricing, the seasonal need from dry docking float planes can be addressed in other ways. TCC disagrees that the airport cannot set different prices for different parking areas. The Airport's fee structure at 17 AAC 45.510, for example, sets different rates depending on whether an area is paved and whether it is tail in or taxi-through. AS 02.15.090 does not contain any barriers to the Airport charging uniform fees for tie-downs at different parking areas. As the EA notes, the existing parking at Echo is different than parking at Charlie, so the Airport could charge a higher fee for the more desirable location (including paved parking and electrical hookups).

Second, as revealed during the General Aviation Master Plan process, 20-year projections for operations at the Lake Hood facility are predicted to be **significantly lower than operations during the mid-1980s**. So the need to build more tie-down spaces to accommodate fewer operations is nonjustifiable. And even though some spaces from Charlie parking were removed a few years ago, they were replaced at the Echo Phase I parking facility. The EA does not make the case that more net spaces are needed when 20-year operation projections do not meet or exceed operations with the amount of tie-downs provided to the GA community in the 1980s. Also, the wait-list for tie-down spaces is significantly less than in the 1980s and, according to TSAIA and their consultants, this trend is likely to continue during the next 20 years due to current pilots getting older and much higher expenses associated with plane ownership, including rising fuel prices, which are unlikely to decline in the next 20 years.

Third, Merrill Field currently has wheeled aircraft tie-down spaces available for lease and now has both paved and gravel runway capability to serve general aviation pilots in the Anchorage Bowl area. By choosing to ignore that there are other tie-down options for GA pilots in Anchorage, the EA is too narrow in scope and once again, does not factor in true need versus want by TSAIA.

## **NO ALTERNATIVES ANALYSIS FOR AIRCRAFT DR. REALIGNMENT:**

The EA does not provide any analysis of alternatives to the realignment of Aircraft Drive. The EA is a post hoc justification of a single course of action — realignment of Aircraft Drive — justified on safety grounds. But alternative ways to address those safety issues are not analyzed. The complete realignment of the road is far more costly and destructive in terms of wetland fill and vegetation removal than alternatives in place at other at-grade vehicle/plane crossings elsewhere on airport property. For example, there is no analysis of installing traffic control devices on Aircraft Drive and the Echo Taxiway like those installed at the intersections of Victor Taxiway and Postmark Drive or Victor Taxiway and Aircraft Drive, which include flashing warning lights and/or railroad-type drop-down arms. Consequently, the EA erroneously rejects both a no realignment alternative and the expansion of Echo Parking to the west because of safety concerns. If the aircraft/traffic conflicts on the current alignment of Aircraft Drive are addressed through traffic control measures, then a modified, smaller P-5B alternative area becomes feasible. TCC is confident that the Airport's snow removal and maintenance operations, which already deal with active

runways and taxiways, can be coordinated to deal with an expanded Echo Parking area to the west in P-5B, if it were comparable in size to what is proposed for Phase II.

Also, the EA does not address the noise impacts to the Turnagain community if Aircraft Drive is realigned through the treed upland area that acts as an airport operations buffer for ground noise.

### III. TCC RESOLUTION:

TCC resolution voted upon by the community council at its December 2005 meeting that formalizes (and reiterates) our opposition to the Echo Parking Expansion and Aircraft Drive Realignment projects. This opposition should not be considered by anyone to be unreasonable or irrational “NIMBI-ism,” for it is merely another formalization of the position the community council has taken regarding the development of Turnagain Bog for GA-related projects since 1999.

As you might recall, at the December 2005 Turnagain Community Council meeting you were asked — in essence — how is it that the Echo Parking Lot Tie-down Expansion and Aircraft Drive Realignment are included in Alternatives B and C of the GA Master Plan, both of which are assumed to be **potential** development proposals. Yet, there is no such expansion shown for the “No Action” Alternative A, which presumably, was a legitimate alternative being offered to the public for consideration and review as part of the GA process. The obvious conclusion our community council drew from this structure of the GA Master Plan alternatives was that Echo Parking and Aircraft Drive Realignment were being considered as part of the various scenarios — not as a project already designed and funded and going ahead as you related to the TCC.

Your response was — and I paraphrase from memory —the airport does not consider this parking expansion and road realignment as part of the GA Master Planning process and the projects were already in the planning stage. This is unacceptable and completely de-legitimizes the federally-funded Master Planning process and associated alternatives the airport has undertaken in conjunction with input from the Technical Advisory Committee and the community, including TCC.

This TCC resolution grew out of a number of stated concerns, including:

- Concerns over additional traffic/noise: In trying to dismiss noise and traffic concerns related to this tie-down expansion, you noted that peak traffic /activity out of the Lake Hood complex occurred in the ‘80s and it is not expected to increase in the coming 20-year GA planning period; hence, the community should have no concerns about traffic volumes, even with an additional tie-down expansion in Turnagain Bog. I admit, I am skeptical of the rationale for your claim that traffic would not increased (directly or secondarily) with the addition of 70 tie-down spaces; however, if that is the case, then another stated concern is relevant;
- No Cost/Benefit justification for project: You were asked project cost, number of tie downs, and monthly cost to park at one of these tie-downs. The cost we heard was \$3 million for 70 additional aircraft tie-down spaces, who would pay

\$60 each per month—and who may or may not actually fly in and out of the airport very often! If these indeed are the numbers, these combined projects have a pay out of 59.5 years on initial capital alone: hardly justification for this expenditure to accommodate 34 people who are currently on a waiting list, according to information you provided.

#### **IV. TCC BOARD REQUEST FOR COMPROMISE:**

*Please note: the following discussion is only on behalf of the TCC Board and has not been put before TCC for consideration.*

If more tie-down spaces are developed at Echo Parking by TSAIA, then the TCC Board request that:

- Any additional tie-down spaces be located **to the west of the current Echo Parking lot**, which would place this type of facility farther from the neighborhood. The feasibility of this option is reflected in TSAIA's GA Master Plan alternative development options: Under Alternatives B, C, and D, the airport showed potential development west of the current Echo facility, as either lease lots or tie-down parking; or
- Additional tie-down spaces be added east of the current Echo parking lot **up to the current alignment of Aircraft Drive, and that safety traffic controls, such as those located elsewhere at TSAIA, be added at the current Aircraft Drive/taxiway intersection.**

**This would be a good compromise** between the GA community, who has expressed a desire for more tie-down spaces (justified or not), TSAIA, who says it wants to be a good neighborhood and cares about community concerns, but seems determined to add additional tie-down spaces regardless of cost versus benefits; and the Turnagain community, who is gravely concerned about locating tie-down spaces closer to our neighborhood and the additional negative impacts associated with it.

We do not feel that “the project is already designed, so we have to develop it summer 2006” is adequate justification for the location of Echo Parking lot Phase II where it is currently slated to be constructed. Working together with the TCC and the GA community to develop an acceptable compromise should be TSAIA's highest priority with regard to this project. This would demonstrate that Director Mort Plumb's desire to be a good neighbor is not just a lofty goal, but a real commitment by the airport.

Sincerely,  
Mark Wiggin, President of Turnagain Community Council  
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