

Staff Issue-Response Summary

Public Review Draft Proposed 2009 Revisions to Anchorage Bowl 2025 Long-Range Transportation Plan (LRTP), with 2007 Revisions May 8, 2009

This document summarizes public comments received for a proposed amendment to the Anchorage Bowl Long-Range Transportation Plan (LRTP). The purpose of the amendment is to delete the Knik Arm Crossing (KAC) project, and to document conformance of the LRTP with new federal planning regulations that became effective after the LRTP was last amended in 2007. This Issue-Response Summary includes comments submitted in 2008 under the earlier assigned P&Z case number (2008-153), and comments submitted during 2009 through May 8, 2009, for presentation to the Planning and Zoning Commission May 11, 2009. A public meeting Open House is scheduled for May 18, 2009, from Noon to 4:00 p.m., followed by a P&Z Work Session at 5:30 p.m., and a P&Z Public Hearing at 6:30 p.m. Comments received after May 8 will be presented to the P&Z Commission during the Public Hearing May 18.

Comments were received from 43 responders in different areas including Girdwood, Anchorage, Elmendorf Air Force Base, Chugiak, Native Village of Eklutna, Wasilla, Talkeetna, and Fairbanks. All of the comments received to date are included in the Summary under the following sections:

- I. Support for Retaining the KAC Project in LRTP (from 11 individuals / agencies)
- II. Support for Removing the KAC Project from LRTP (from 32 individuals / agencies)
- III. Other LRTP Comments (from 1 agency)
- IV. Copies of Original Comments

Within Sections I through III, comments are organized into 47 different issue areas identified. Most of the comments addressed in Sections I and II are yes or no votes for retaining the bridge in the LRTP, with reasons given, and for most of them, a staff response is not provided. A staff response is provided, however, where clarification of information may be needed. A staff response is provided for all of the comments in Section III. Copies of original written comments are included in Attachment A.

I. SUPPORT FOR RETAINING THE KAC PROJECT IN LRTP (COMMENTS FROM 11 INDIVIDUALS OR GROUPS)

1. Issue: Considerable Time and Effort Already Invested to Make Knik Arm Crossing a Reality.

- ❖ **Comment:** The proposed amendment to remove the KAC project from the LRTP disregards the over-\$40 million and five years of studies invested by the State in Project development and over 30 months of public involvement in incorporating the project into the existing LRTP.
- ❖ **Comment:** Not in favor of removing the Knik Arm Crossing from the LRTP. We have invested countless hours and substantial effort to mitigate and resolve Cultural issues, habitat concerns, and other matters in order for the Knik Arm Crossing to become a reality.
- ❖ **Comment:** By deleting the project from AMATS, the public process could be by-passed given all of the public, municipal, state and federal input that has been collected over the years; and all of the work that the Knik Arm Bridge and Toll Authority (KABATA) has completed to date.
- ❖ **Comment:** The paved road to Port MacKenzie has been completed, the rail line is in the process of being straightened (to my understanding), and millions have been spent on the launch of this project. It would be a colossal waste of public funds if this project was not seen to completion...Please finish the job and we will all be thankful in the future.

2. Issue: Relief for Congestion on Glenn Highway

- ❖ **Comment:** In our daily commutes we experience the congestion of the Glenn Highway, including snail paced traffic whenever an accident occurs or construction and maintenance interferes with travel. These days Eklutna villagers and workers are bombarded with traffic noise and intruders on a daily basis.
- ❖ **Comment:** The bridge would serve existing needs to handle vehicle traffic and ease the commuting pressure imposed on the Glenn Highway.

Staff Response: Staff Response: The 2007 revision to the Anchorage Bowl 2025 LRTP, Chapter 12, that added the Knik Arm Crossing to the LRTP, states on page 11, "According to the regional model results, the opening of the bridge does not seem to have a significant effect on the amount of traffic on the Glenn Highway coming into Anchorage, which would remain about the same with or without the bridge."

3. Issue: Expected Growth in Anchorage and Mat-Su Area

- ❖ **Comment:** There is expected growth in Anchorage and the Matanuska-Susitna area. We believe adding the bridge would not harm development in the Chugiak-Eagle River area, rather it would make traffic more manageable as growth matures.
- ❖ **Comment:** The bridge would establish the transportation infrastructure for the population and economic growth in the Mat-Su. The bridge's uses could also be expanded over time to include the railroad, include the Tony Knowles Coastal Trail, support a "utilidor", and house a power plant powered by tidal action.
- ❖ **Comment:** short-term thinking like removing the bridge from the Long Range Transportation Plan will assure that Palmer and Wasilla become the commercial and industrial centers of Alaska. It will be interesting to watch Anchorage become the suburb of Wasilla.
- ❖ **Comment:** We can't let a few ignorant, short sighted naysayers stop a long range vision for a sound plan for the city of Anchorage. In 20 years there will be 40k to 75k people living on the other side of the inlet. We will need a robust transportation infrastructure to make it happen. We cannot afford to stick our heads in the sand and pretend it ain't gonna happen. Plan ahead, plan responsibly, and build the Knik Arm Bridge now!

4. Issue: Mobility Options / Two Routes for Egress Needed

- ❖ **Comment:** Deleting the KAC project from the LRTP would serve to limit mobility options for the movement of people and freight and deny generations of Alaskans an alternate safety corridor to the Glenn Highway.
- ❖ **Comment:** So far there's only a one way ticket, as in one road. Traveling from the lower Knik Arm lands will be extremely lengthy with only one route

as it is with Big Lake commuters even now. These days Eklutna villagers and workers are bombarded with traffic noise and intruders on a daily basis. We suspect that the economic scare has given decision makers cold feet, a timid retreat that fails to see past today. Two routes...A good plan has two routes out.

- ❖ **Comment:** The bridge would serve existing needs to serve as an alternate north-south emergency response and disaster evacuation route.
- ❖ **Comment:** Without improved access, Anchorage will become more isolated than Juneau, landlocked by the 30 mile traffic jam on our one road. At least Juneau has ferry service to go along with its airport.

Staff Response: Having second access route in and out of Anchorage is a concept supported by both the Anchorage Bowl 2025 LRTP, revised in 2007, and the Chugiak-Eagle River 2027 LRTP, approved in 2007.

5. Issue: Decision to Delete KAC from LRTP is “Political”

- ❖ **Comment:** Media article forwarded as comment: “In anticipation of a Sullivan victory and a pro-development administration, the AMATS Technical Advisory Committee (TAC) is not wasting any time...If the project is removed from the long range transportation plan, the feds will cancel any funding and will not sign the Record of Decision – effectively killing the project...The timeline for pushing this amendment through very conveniently ensures that it will be done before a new mayor takes over on July and changes the makeup of the committee...this action is being undertaken prior to any change in administration to further advance the agenda of a select few who are openly opposed to the project...”
- ❖ **Comment:** Removing the Knik Bridge from the Long Range Transportation Plan appears to me to be the epitome of short-range politics to the detriment of long-range planning.

6. Issue: Bridge should be Viewed as a Long-Term Goal

- ❖ **Comment:** Strong support for the idea of constructing the bridge and believe that removing the project from AMATS is short-sighted. Instead, the bridge project should be viewed as a long-term goal. The project's value should be considered from a higher viewpoint that just from the interests of the Municipality of Anchorage.
- ❖ **Comment:** Please keep in long term plan.

7. Issue: Bridge Would Increase Available Residential Property

- ❖ **Comment:** Strong support for the Knik Arm Bridge project, and urge AMATS and the Assembly to support it now and in the future. There is no other single project in the queue that will double the size of available property in the Anchorage Bowl. I have grandchildren and children here in Anchorage. They cannot afford to purchase property in the Anchorage Bowl or buy-build a house. If they had the opportunity to commute from the Valley via a 10-minutes drive, they would stay here and add to our growing productive economy. Please support this project. It is the single most important thing we have going on here in Anchorage. Thank you.

8. Issue: Support for Bridge Concept but not for Current Design

- ❖ **Comment:** I favor the bridge, and oppose removing the bridge from the LRTP. I realize there are challenges but I still believe it's a good idea. My particular disappointments with the present vision for the first completion phase are 1) it's a radical mistake NOT to include muscle-powered right of way on the bridge. There are SO MANY ways that such a capability could be used, e.g., it would augment our trail system, which while struggling in some corridors, is still fantastic facility both for residents and for tourism, and 2) my second complaint is that rail is not a part of the bridge. In my own perfect world, there would be ONLY light rail and muscle. You'd not encourage more auto traffic in Anchorage city, encourage public transport and healthy exercise, and reduce both CO2 emission, AND hardening of the arteries (human and vehicular). As an extension, buses and trucks could even be transported across by rail.
- ❖ **Comment:** It needs to be planned and built with future expansion for light rail included.

9. Issue: Beneficial Economic Impact

- ❖ **Comment:** Deleting the KAC project from the LRTP would deny the residents of Southcentral 5,000 jobs and a \$680 million stimulus project during the current economic recession.
- ❖ **Comment:** There are no other transportation projects in this state that I am aware of that have anywhere near the potential for adding value and growing this economy.
- ❖ **Comment:** The bridge will be good for the local economy and produce many new, needed jobs.

Staff Response: The proposed amendment, Draft Chapter 13, includes an Expanded Background section in an Addendum that discusses MOA's concerns for negative economic impacts to Anchorage. The LRTP revised in 2007, estimates that as a result of completion of the proposed bridge, the MOA is projected to lose 4,900 households (or 12,900 people) and 5,800 jobs to the Mat-Su that MOA would otherwise be expected to capture by 2027. Other negative economic impacts to MOA are discussed under Section II of this Summary.

10. Issue: Direct Access Link to Port of Anchorage

- ❖ **Comment:** In my opinion, the most important benefit [of the KAC project] will be a much more direct access link to the Port of Anchorage. There are limitless resources in the interior that may be profitable to extract given the straightened rail line to Port MacKenzie, and the possibility of adding a rail line to the bridge in the future to the Port of Anchorage is a very clear #2 priority to building the natural gas pipeline.

11. Issue: Build Sooner for Lower Cost

- ❖ **Comment:** Build the Knik Arm Bridge and build it now! The sooner we get started the less it will cost.

12. Issue: Bridge will Enhance Technology, Harmony with Nature

- ❖ **Comment:** The Knik Arm Bridge will advance technology, enhance understanding of environmental concerns and the ability to complete large engineering projects in harmony with nature.

Staff Response:

13. Issue: Draft Financial Plan Fails to Meet Federal Planning Regulations (23 CFR 450.322 (10))

- ❖ **Comment:** The Draft financial plan does not contain system-level estimates of costs and revenue sources needed to adequately operate and maintain Federal-aid highways and public transportation. Only Capital projects are considered in the draft financial plan and operating and maintenance costs and revenues for Federal-aid highways and public transportation are not included.

Staff Response: The requirements under federal regulations are being met. 23 Code of Federal Regulations (CFR) Sec. 450.322 Metropolitan transportation planning process: Transportation plan, sub-section 11 states the following:

(11) Include a financial plan demonstrating the consistency of proposed transportation investments with already available and projected sources of revenue. The financial plan shall compare the estimated revenue from existing and proposed funding sources that can reasonably be expected to be available for transportation uses, and the estimated costs of constructing, maintaining and operating the total (existing plus planned) transportation system over the period of the plan. The estimated revenue by existing revenue source (local, State, and Federal and private) available for transportation projects shall be determined and any shortfalls identified. Proposed new revenues and/or revenue sources to cover shortfalls shall be identified, including strategies for ensuring their availability for proposed investments. Existing and proposed revenues shall cover all forecasted capital, operating, and maintenance costs. All cost and revenue projections shall be based on the data reflecting the existing situation and historical trends. For nonattainment and maintenance areas, the financial plan shall address the specific financial strategies required to ensure the implementation of projects and programs to reach air quality compliance.

Staff would agree the cost for operation and maintenance has not been fully reported in the draft documents released by the Policy Committee. The basic historical assumptions of the local and state support to fund the operations and maintenance of the transportation system for the movement of people and goods will remain a local and state priority. The levels of funding have varied over time and there is concern the states ability to adequately fund the operation and maintenance of the system is in part depending on the

availability of general fund revenues programmed for state highway and bridge maintenance. At the local level, similar assumptions have been made.

A more complete description of the operation and maintenance cost will be available as comments are addressed and a final draft financial plan is revised.

❖ **Comment:** The Draft financial plan has not included State cooperative participation in developing estimates of all necessary financial resources from public and private sources that are reasonably expected to be made available to carry out the transportation plan. Rather aggressive revenue assumptions totaling over \$1.4 billion were made about Anchorage's share of revenue from:

- i. a yet-to-be established Alaska Transportation Fund
- ii. a yet-to-be established Alaska Infrastructure Bank
- iii. gas line infrastructure funding from the State, and
- iv. future State bond issues.

These new and aggressive revenue assumptions represent funding for approximately 30% of the \$4.7 billion of projected total capital projects cost during the term of the LRTP according to the published draft financial plan.

Staff Response: Staff would disagree that State's participation has not been included in the discussion of potential new sources of revenue that may be needed to fund the recommended improvements in the LRTP. Staff would agree not all parties in the discussion are in agreement and further discussion is necessary and warranted before AMATS Policy Committee takes final action. Part of the public review process is to gain further knowledge and comments on the matter. Staff did discuss some initial options and made changes to the first staff proposals as a result of ADOT&PF's staff, AMATS Technical Committee members and others concerned over the sources and amounts.

Staff would also agree that aggressive revenue assumptions have been proposed related to the sources and the amounts. The sources of new revenues are based on existing State documents and policies, however the estimated amounts are rough estimates based on LRTP project needs and in some cases past State practices.

Staff assumed an Alaska Gasline would be built in the next 20 years with the need for the State to invest in transportation infrastructure to compliment the gas line. It seemed reasonable that part of those infrastructure improvements would occur in the AMATS area. Secondly, the ADOT&PF's most recent Statewide Plan recognized the need for new sources of funds, beyond the traditional federal Highway funds, which the State and AMATS have been heavily depended upon for the last decade or more. The Statewide transportation plan recommends creating an Alaska Transportation Fund; however, the level and distribution of those funds are not clear in their plan. For the LRTP, it is assumed such funds would be created in the next 20 years and that a portion of those funds would be directed to the AMATS area. Lastly, a most significant is the assumption that the previous opportunities for voter approved Statewide Bonds for transportation improvements would increase in frequency. It seems reasonable that these type of programs would either be crated or expand in the next 20 years, the key debate is at what level would they support the future needs.

As noted above, though is this public review process, there maybe additional opportunities and scenarios to support the transportation infrastructure that are not included in the draft financial plan, such as Public Private Partnerships or other funding and financing mechanisms.

- ❖ **Comment:** The Draft financial plan does not describe recommendations and strategies for ensuring the availability of new funding sources. No description of recommendations and strategies for ensuring the availability of new funding sources was given in the financial plan. This is particularly troubling in light of the rather aggressive revenue assumptions described [in the previous comment.]

Staff Response: [See response above.]

- ❖ **Comment:** The Draft financial plan does not provide revenue and cost estimates in year of expenditure dollars based on reasonable financial principals and assumptions developed cooperatively with the State. The financial plan presented escalates a total pool of capital costs to Year of Expenditure dollars based on what is left after projected funding for each year of the plan. Federal regulations indicate that individual projects to be escalated to Year of Expenditure based on the schedule in the program.

Staff Response: Staff would agree with the comments, the financial plan does not include revenue and cost estimated in year of expenditure for planning purposes that is not necessary or required. What is required is an analysis of projected costs for all projects in the LRTP and an estimation of an inflation rate. Similarly, an estimation of project revenues for planning purposes is required.

For purposes of the financial plan, staff estimated the cost of all projects in 2009 dollars and applied an inflation rate to total number for future years.

Staff would recognize that for purposes of creating a Transportation Improvement Program (TIP), not an LRTP, individual project funding for each year of the TIP is required and will be done so in the new TIP currently being developed.

- ❖ **Comment:** The draft financial plan does not evaluate fiscal constraint within sub-categories. Certain revenue sources are restricted as to what type of transportation infrastructure they can be expended on, such as Federal NHS (Non-Highway System) funds.

Staff Response: Staff disagrees; the draft funding table provided for review does illustrate revenue sources by category {i.e. Local Road capital, AK Legislative Capital Program, FHWA National Highway System (NHS ...)}. Staff will refine the information to estimate the comparison of the fund source with the project type for purpose of information. Since there has been flexibility in the federal highway program to allow for funds from one category to be used on projects in other categories, with State and AMATS approval, the draft financial plan did not go into that unnecessary detail.

- ❖ **Comment:** In light of the foregoing, it appears that the fiscal constraint test has not been met by the draft financial plan. It is obvious that other mandatory financial plan elements required by Federal regulations are not included in it. A reasonable and cooperative evaluation of whether the draft financial plan presented is financially constrained could lead to as much as 30% of the capital costs being scaled back, deferred, or dropped from the LRTP.

Staff Response: Staff would agree the test for financial constrain is difficult as the commenter has suggested, and a combination of existing and new future fund source are necessary if the existing transportation recommendation in

the plan are to be continued. The ability to forecast future trends of existing sources is sometimes difficult. Forecasting the availability and opportunity for new sources and the level of funding is difficult. The ability for policy makers to consider the inclusion of new sources at AMATS, and equally so at a State level is a challenge and often more difficult to forecast.

For purposes of the revised financial plan for this amendment; staff assumed the existing transportation system improvements, not including the Knik Arm crossing, would remain in the community's transportation plan. The new methodology for forecasting transportation project cost has illustrated the need to identify additional sources of revenue in addition to existing programs.

An alternative approach was considered but not recommended, which was to remove some needed projects from the transportation plan to equal the amount of project revenue from existing sources. This approach does have some merit in addressing the financial constraints facing AMATS and frankly the State in general. This approach does nothing to address the projected travel demand, transportation improvements that support our adopted land use plan and our ability managing congestion at an acceptable level.

14. Issue: Amendment Process Lacked Consideration and Consultation of Beneficiaries of Project

- ❖ **Comment:** The process to remove the Knik Arm Crossing project from the LRTP has not included consideration, consultation, cooperation, or coordination with the State and other project beneficiaries in the region, including the Mat-Su Borough and political subdivisions thereof.

Staff Response: The AMATS Policy Committee directed the AMATS Technical Advisory Committee to begin the process of considering the removal of the KAC project from the LRTP. The Policy Committee made it clear that the process to do this would be to develop a draft amendment for public review and comment, and the AMATS Technical Advisory Committee directed staff to develop a draft amendment. Both AMATS committees include members of the State of Alaska Department of Transportation and Public Facilities and Department of Environmental Conservation. During meetings conducted by both AMATS committees, the public was invited to

attend. KABATA representatives provided testimony at all meetings, and other members of the public provided comments in support of the bridge.

Staff did consult with planners of the Alaska Railroad and Mat-Su Borough in developing the Draft LRTP Amendment. Staff also conducted broad outreach to environmental and cultural resource agencies, including Native Village of Eklutna (NVE). NVE is a firm supporter of the KAC project, and has asked that the bridge remain in the LRTP. Their comments are included in Sections I and IV. In addition, KABATA was included in the Air Quality Consultation Team that met to discuss the approach and assumptions for modeling for demonstrating conformity with EPA air quality regulations. KABATA provided comments during that review process that will be addressed by the Consultation Team as a whole. The draft amendment includes an expanded Background Section that includes concerns of the ARRC and Mat-Su Borough, both of whom are supporters of the Knik Arm Crossing. Staff has received comments in support of the bridge and has taken care to include all of them in this Issue-Response Summary for review by the Planning and Zoning Commission and the Anchorage Assembly.

15. Issue: Timing Not Right / Build Bridge Later

- ❖ **Comment:** Knik Arm Bridge Project can be part of a conscious effort to preserve the aesthetics of the places we live if we incorporate geography into our long range planning. To prevent merged, multiple urban communities without visible boundaries, we have the Palmer Hayflats, the Knik Arm, and the Chugach Mountains separating Anchorage, Wasilla, Knik, and the Kenai Peninsula. Each area will develop its own population, infrastructure, and economic base, and when Knik's time comes, we may both be happier to have preserved the natural separation we now have. Why are we proud of Alaska anyway, so many of us, if not for a certain beauty, ever more difficult to find elsewhere?
- ❖ **Comment:** The time is not yet right for a Knik Arm Crossing Project. 1) This idea needs much more research and needs to be more closely linked to developing areawide mass transit. 2) There needs to be an aggressive public process that reaches out to residents whom are in the low income neighborhoods surrounding downtown and a study needs to be made to examine the impacts this project would have on the quality of life for the thousands of residents living in the neighborhoods of greater downtown, as

well as how the vitality of Anchorage's commercial center may be impacted.
3) When/if the project is built we should make certain the bridge project is property of the people of Alaska so that it serves our interests.

II. SUPPORT FOR REMOVING THE KAC PROJECT FROM LRTP (COMMENTS FROM 32 INDIVIDUALS OR GROUPS)

16. Issue: Cost of the Knik Arm Crossing Project

- ❖ **Comment:** Strongly opposed, citing the sheer cost of the project. As time has passed, the realities of the cost of the project have come into focus. I began to really question the wisdom of the project.
- ❖ **Comment:** This project could cost \$1 billion to complete.
- ❖ **Comment:** Due to the extremely high cost of the bridge I strongly oppose the construction of such a project.
- ❖ **Comment:** I believe the Knik Arm Bridge project should be removed from the Anchorage Bowl LRTP. I understand the project will cost over \$1 billion and I do not believe that plans for cost recovery such as a toll, pencils out.
- ❖ **Comment:** It's time to lose the MacKenzie bridge proposal. It's too costly.
- ❖ **Comment:** The Knik Bridge is a horrible idea. Throw this out. We don't need it. It will be too expensive.
- ❖ **Comment:** Please remove the Knik Bridge from the long-term transportation plan. The cost of the bridge and additional infrastructure it will require are not worth it.
- ❖ **Comment:** I strongly oppose the building of a bridge across the Knik Arm. Any benefits derived would not outweigh the enormous costs.
- ❖ **Comment:** The bridge will be very expensive.
- ❖ **Comment:** The Knik Arm bridge will be brutally expensive to build and maintain.

- ❖ **Comment:** The exorbitant expense is of poor judgment.
- ❖ **Comment:** Please stop the Knik Arm Bridge project. It is far too expensive.
- ❖ **Comment:** A bridge will be a budgetary disaster. We can do better. Please do not put any more money into studying or considering the bridge. We can make much better use of our money and resources. Thank you for considering my views.
- ❖ **Comment:** As a resident of the Mat Su Valley since 1977, I am opposed to the Knik Arm Bridge being apart of the Anchorage Long Range Transportation Plan. There are too many negative impacts from building this mega bridge. We will be paying for it for years. It will not pay for itself. It could cost \$1 billion and drain the Anchorage and Mat Su tax base. It is clearly a waste of valuable money.
- ❖ **Comment:** Please remove the Knik Arm Bridge from the LRTP; it is far too expensive.

**17. Issue: Money could be Better Spent on Public Transportation
(Also See Issue #28, Commuter Rail, and #29, Reduce SOV
Traffic)**

- ❖ **Comment:** Strongly opposed -- the money would be better spent if invested into public transportation (i.e. light rail to the Valley, and improved mass transit at each end.)
- ❖ **Comment:** Anchorage is in need of viable public transportation. One only needs look at European cities to see how to do it and how well it works.
- ❖ **Comment:** I am strongly opposed to spending any additional money to explore, permit or build the Knik Arm Bridge. I live in Peters Creek and I take the People Mover bus to and from work in downtown Anchorage every week day. I think our dollars are best spent to improve/expand the bus system.
- ❖ **Comment:** The Knik Arm Bridge should be removed. It is a project that is unnecessary and counterproductive. The money should be saved and spent

on real solutions that would remove cars from the road. We should not follow the California model where more roads have simply meant more cars. Thanks.

- ❖ **Comment:** I do support creating an economical and practical mass transit system linking the communities that currently exist to the north of Anchorage to Anchorage.
- ❖ **Comment:** Please scrap the Knik Arm Bridge project. I do not believe this is a good use of a huge chunk of cash, and it's the wrong direction to go toward solving our traffic problems. Oil prices are down at the moment, but I believe this is only temporary and that high gas prices are here to stay. We should be using our resources instead for expanding and upgrading our bus system; putting in a light rail system to the Valley, and possibly a second one south; investing in clean renewable energy projects; and public relations messages to encourage people to use our new and improved public transportation. We need to cure our addiction to oil. Thank you.
- ❖ **Comment:** Please remove the Knik Arm Bridge from the Anchorage Long-Range Transportation Plan. I grew up in Palmer and commuted into Anchorage daily. We should focus attention towards more sustainable transportation and development. Please remove the bridge from future planning efforts. Thank you.
- ❖ **Comment:** I urge you to remove the Knik Arm Bridge project from the Anchorage Long-Range Transportation Plan. A more appropriate, cost-effective, and forward looking project would be to create a usable mass transit system between Anchorage and the Mat-Su Valley, and within Anchorage.
- ❖ **Comment:** The money could be better used to build light rail to the Mat-Su Valley, which is a much more urgent need.
- ❖ **Comment:** Yes, please remove the Knik Arm Crossing from plans! It represents a giant leap for our transportation infrastructure – in the WRONG DIRECTION! We need to be moving towards mass transit.

18. Issue: Traffic Congestion and Negative Impacts to Downtown Anchorage and Neighborhoods

- ❖ **Comment:** Strongly opposed, citing traffic congestion impacts.
- ❖ **Comment:** Removing the KAB from the LRTP is the right thing to do. The project is likely to create direct threats to downtown neighborhoods already suffering from the negative effects of a transportation infrastructure designed without adequate consideration to community development needs and land use impacts. I am also concerned about the vitality of our downtown business core and what impact the KAB project would have on its revival or decay. The KAB needs a much more extensive public process and the consent of residents in the impacted neighborhoods before it should be included again into the LRTP.
- ❖ **Comment:** Due to the increased traffic downtown I strongly oppose the construction of such a project. I live downtown, and would hope that you consider all the reasons that this project would be a bad idea for Anchorage.
- ❖ **Comment:** As a thirty year Government Hill resident and having earned my livelihood at the Port of Anchorage since 1974 offers a unique position to see that the disruption of community, poor planning for traffic and business show a Knik Arm crossing to be of poor judgment.
- ❖ **Comment:** The current plans to dump traffic into downtown are opposed by most homeowners who would be affected. This bridge will create many more problems than it solves.

19. Issue: Inadequate Bridge Design

- ❖ **Comment:** Strongly opposed, citing single lane design.
- ❖ **Comment:** The Knik Arm Bridge will be an eyesore.

20. Issue: Cost of Infrastructure Requirements in the Valley

- ❖ **Comment:** Strongly opposed, citing the cost of infrastructure requirements in the valley.

21. Issue: Ownership of Bridge

- ❖ **Comment:** Strongly opposed, citing private ownership.

22. Issue: Final Environmental Impact Statement Preferred Alternative: Impact of Environmental Agencies' Concerns

- ❖ **Comment:** Would the preferred alternative for the Knik Arm Bridge evaluated in the bridge's *Environmental Impact Statement (EIS)*, be approved by NOAA/NMFS? NOAA/NMFS sent a letter to KABATA following issuance of the Final EIS which stated that, "The environmental consequences of [the preferred] alternative cause us to continue to support the No Action Alternative as the best option for promoting the recovery of Cook Inlet belugas and sustaining upper Cook Inlet salmon runs." If NOAA/NMFS would not approve the current bridge design, what types of design changes are needed for NOAA/NMFS to approve a bridge design?
- ❖ **Comment:** How does KABATA plan to address NOAA/NMFS' concerns about the current bridge design? Has KABATA estimated how much any potential design changes might cost?

23. Issue: KAC Financing Details

- ❖ **Comment:** What is the current financial plan for bridge funding, including connecting the bridge to Ingra-Gambell (i.e., Phase 2)? Will KABATA share this plan with AMATS? Does the plan include additional money from the federal government, the state and/or Anchorage or the Mat-Su? If yes, how much? KABATA's Attorney Bill Greene recently told the TAC that KABATA's Request for Proposal from private partners is at a very early stage. The Chair of the KABATA Board, Mike Foster, recently told the TAC that KABATA is exploring alternative ways of paying for the bridge in addition to funding from private partners. Additionally, KABATA stated in 2008 that the Ingra-Gambell connection would not be the responsibility of the private partners.
- ❖ **Comment:** What is the status of the bridge's private partners and their current interest in funding this project? When did KABATA last meet with them and what was discussed?

- ❖ **Comment:** If it is a toll bridge, the toll will be so high that people won't use it or it will be heavily subsidized. Both are unacceptable.

24. Issue: KAC Contradicts the Anchorage Bowl Comprehensive Plan / Need to Prevent Sprawl

- ❖ **Comment:** It is time to remove the Knik Arm Bridge to nowhere proposal from the Long Range Transportation Plan. This project contradicts the Comprehensive Plan. We need to incorporate modern land use planning.
- ❖ **Comment:** I am interested in a transportation plan that prevents sprawl, reduces gas usage, and is both affordable and sustainable. For these reasons, I do not support including the Knik Arm Bridge in the LRTP.
- ❖ **Comment:** Not supportive of the Knik Arm Bridge. It would promote urban sprawl.
- ❖ **Comment:** I believe the Knik Arm Bridge project should be removed from the Anchorage Long-Range Transportation Plan. I believe the Knik Arm Bridge project would undercut the successful development occurring in Anchorage today, development which is improving the quality of life and experience of visitors. This has long term economic benefits for the city. I believe the Knik Arm Bridge project [would] negatively affect the progressive re-development occurring now, and would cause sprawl.
- ❖ **Comment:** The MacKenzie bridge proposal will create unnecessary urban sprawl.
- ❖ **Comment:** Our dollars are best spent to institute improved zoning and planning requirements that reward improved use of land for development and not urban sprawl. Thank you for your consideration.
- ❖ **Comment:** Any benefits derived would not outweigh the enormous costs in terms of dollars and urban sprawl.
- ❖ **Comment:** I am writing to urge the Commission to drop any future plans for the Knik Arm Bridge. I grew up in Anchorage and Chugiak, and keep seeing people push out to new commuter communities – but Southcentral has huge amounts of land. It's just inefficiently used. Instead of spending huge

amounts to create more sprawling suburbs, we need to look into using the land already developed. The Knik Arm Bridge is a boondoggle. Let's look at real solutions for transportation and livable, walkable communities – not just blindly grope for more space.

- ❖ **Comment:** The bridge will lead to greater sprawl. In the Southcentral region, we should focus attention towards more sustainable development. Please remove the bridge from future planning efforts. Thank you.
- ❖ **Comment:** Please delete the Knik Arm Bridge from the LRTP. I was a member of the Advisory Committee to the Long Range Transportation Plan. We never discussed the Knik Arm Bridge. In fact, I was asked by one of the consultants to please drop it because it was so uncertain that they did not want to try to deal with it. The Knik Arm Bridge is not consistent with our comprehensive plan. It would lead to a great deal of sprawl and make implementing Anchorage 2020 difficult or impossible.
- ❖ **Comment:** The Knik Arm Bridge project will only encourage urban sprawl. This is a project that should only be built when the population is much larger than it is now or in the foreseeable future.
- ❖ **Comment:** I urge you to remove the Knik Arm Bridge project from the Anchorage Long-Range Transportation Plan. The use of automobiles to commute long distances to sprawling suburbs will soon be recognized as one of the most wasteful, foolish missteps of 20th century planning in the United States.
- ❖ **Comment:** The bridge will stimulate speculative sprawl.
- ❖ **Comment:** The bridge would drain the Anchorage tax base by creating sprawl.
- ❖ **Comment:** We need to be moving towards less sprawl, telecommuting, etc.

25. Issue: Bridge Effects on Commute

- ❖ **Comment:** This project would make for a longer, more expensive trip between Anchorage and Wasilla.

- ❖ **Comment:** The Knik Arm Bridge will not shorten the drive from the valley. This project needs to be terminated. There is no reason for it.
- ❖ **Comment:** The bridge will not reduce commute time for people living in Palmer and Wasilla.
- ❖ **Comment:** The bridge will not reduce travel time to Anchorage for most Valley residents.
- ❖ **Comment:** When the price of gas goes back to \$4 or \$5 a gallon, this bridge will not in any way assist the commuting needs of the 20,000+ daily commuters from the valley.
- ❖ **Comment:** Please note the KAC would do nothing for the vast majority of current valley-to-Anchorage commuters, except add a longer option with a toll!

Staff Response: The 2007 revision to the Anchorage Bowl 2025 LRTP, Chapter 12, that added the Knik Arm Crossing to the LRTP, states on page 11, "According to the regional model results, the opening of the bridge does not seem to have a significant effect on the amount of traffic on the Glenn Highway coming into Anchorage, which would remain about the same with or without the bridge."

26. **Issue: Negative Effect on Anchorage Tax Base (See also Issue #24, Sprawl)**

- ❖ **Comment:** This project would drain the Anchorage tax base.
- ❖ **Comment:** I believe the Knik Arm Bridge project would drain the Anchorage tax base. I'm not concerned about our ability to raise the capital to build the bridge, but I am very concerned about our ability to maintain it without continued drain on the tax base once it is built.
- ❖ **Comment:** It's time to lose the MacKenzie bridge proposal. It will diminish the Anchorage tax base.
- ❖ **Comment:** The bridge would drain the Anchorage tax base by creating sprawl.

Staff Response: The proposed amendment, Draft Chapter 13, includes an Addendum with an expanded background. The effect of the bridge on anticipated revenues and expenditures is discussed on page 38 of the draft amendment.

27. Issue: Needs Fiscal Oversight / Conditions for Retaining KAC in LRTP (See Also Issue #22, Environmental Impact)

- ❖ **Comment:** It is our hope that the Policy Committee will decide as soon as possible whether or not the bridge should remain in the LRTP or, alternatively, that the committee will give KABATA clear conditions with a short timeline which – if not met – would require removal of the Bridge from the LRTP. Without such a decision, KABATA will continue to spend significant amounts of money that may never result in a bridge. Note that KABATA has spent approximately \$44 million (see Web site: www.akbridgesandroadstonowhere.org) to date, its costs are projected to be \$4.9 million in FY 09 (over \$13,000/day), and there is approximately \$60 million in federal money currently dedicated to the Bridge which will be spent unless the Policy Committee acts.

28. Issue: Need Commuter Rail System (See also Issue #17, Public Transportation; Issue 28, Economic Crisis, and #31, Diversion of Needed Resources)

- ❖ **Comment:** We need to build a commuter rail system.
- ❖ **Comment:** Please focus efforts on reducing individual vehicle traffic by implementing commuter rail.
- ❖ **Comment:** Let's promote a light rail to the valley instead, keeping up with the need to change the way we commute. Thanks.
- ❖ **Comment:** It's time for the Valley-ANC commuter train with supporting / connecting urban transport.
- ❖ **Comment:** I am completely against a Knik bridge. I am for a commuter rail between Anchorage and the Mat Su Borough.

- ❖ **Comment:** We need to get the railway moving asap.
- ❖ **Comment:** I WILL NOT USE THE BRIDGE. I believe that there should be commuter rail which I definitely would use. LET US HAVE COMMUTER RAIL. Thank you. Please consider this.

Staff Response: The Chugiak-Eagle River 2027 LRTP, approved by the AMATS Policy Committee, includes draft recommendations for the OS&HP that are still being considered by the AMATS Technical Advisory Committee. One of these recommendations, page 91, is that lands in Study Areas B, C, and E be considered adjacent to the rail lines for an intermodal transit facility or other appropriate public purpose during the master planning process. "Commuter rail service through the Chugiak-Eagle River area to the Anchorage Bowl and the Mat-Su Valley could be operational in the future. It is important to preserve the opportunity along the rail lines in these areas for future service." <http://www.muni.org/transplan/CERLRTPUpdate.cfm>

29. Issue: Reduce Single-Occupant Vehicle (SOV) Traffic

(See also Issue #17, Public Transportation, #32, Economic Crisis, #33, Air Quality)

- ❖ **Comment:** I am opposed to the Knik Bridge. Please focus efforts on reducing individual vehicle traffic by implementing coordinated vanpool and mass transit options with the existing infrastructure. Let's reduce emissions, improve quality of life and reduce our dependence on personal vehicles rather than building more roads and bridges that will only encourage more cars on the roads. Thank you.

Staff Response: MOA published in 2007 the MOA Air Quality Conformity Determination report for the LRTP amendment to add the KAC to the LRTP. The report, page 26, found that the amendment to include the Knik Arm Crossing in the 2025 LRTP would not undermine the ability of the MOA to maintain compliance with the EPA carbon monoxide standards. However, because the bridge will have an impact on a much wider area than the Anchorage Bowl and downtown, the air quality analysis does not evaluate the full extent of air quality impacts on the region. The report includes a section on "Transportation Impacts of the Knik Arm Bridge on the Regional Transportation System." The report may be found at the following Web site:

30. Issue: Need to Solve Current Problems

- ❖ **Comment:** I am interested in a transportation plan that solves current problems.

31. Issue: Diversion of Resources Needed for Higher Priority Projects (See also Issue #28, Commuter Rail)

- ❖ **Comment:** Whether to retain the Knik Arm Bridge in the LRTP is clearly a policy decision. Declining federal funding for transportation nationwide makes prioritization of projects imperative. The Bridge represents infrastructure that Anchorage can no longer afford.
- ❖ **Comment:** The \$43 million in federal taxpayers' money already wasted by the Knik Arm Bridge and Toll Authority agency could have filled a lot of potholes in this town. We need to fix our rutted roads.
- ❖ **Comment:** Not supportive of the Knik Arm Bridge. There is a great need to improve access to our existing communities. Such as commuter train to Girdwood, Palmer and Wasilla. The Knik Arm Bridge would divert needed resources costing more in infrastructure.
- ❖ **Comment:** The Knik Arm Bridge project is a bad proposal all the way around. This project has already taken millions of dollars away from maintaining the infrastructure that we already have.
- ❖ **Comment:** We have a good useable road between Anchorage and the Mat Su Borough. We need to improve the roads we have.
- ❖ **Comment:** The Glenn/Seward Highway connection needs to be priority #1. Also please consider completing the coastal trail. With the work recently completed near Indian/Bird the possibility of a trail that extends from downtown Anchorage to Girdwood exists. This trail would be a huge benefit to local residents and the local tourist industry. Thanks.
- ❖ **Comment:** A bridge would drain our budget, and do little good for the amount of money expended. We need to improve the roads we have, to get

the railway moving asap, and to put money into schools and wholesome recreational opportunities for young people, and all ages. The last thing we need is a bridge. I am a Mat-Su resident, and I am solidly and firmly against a bridge. We don't need it!

- ❖ **Comment:** Yes, remove the Knik Arm Bridge Crossing. The money can be better spent on improving and maintaining existing state transportation infrastructure like roads and bridges, and the state ferry system. Better yet, explore the possibility of building new spurs to the Alaska Railroad to benefit all Alaskans – not just those of us living in Southcentral. Build more railroads to outlying towns and villages. No more Bridges to No Where!

Staff Response: Funding for the KAC project up to this stage is provided through the federal Highway Trust Fund, specifically under the category of National Highway System (NHS) roads. Decision authority for how and where within Alaska those funds are spent currently rests with the Alaska Department of Transportation of Highways and Public Transportation (ADOT&PF). It is true that if the bridge were not built, any unspent federal monies *could, but not necessarily,* be spent on other NHS roads within MOA. MOA can provide input to the process by means of recommendations, but the final decision rests with ADOT&PF.

32. Issue: Current Economic Crisis

- ❖ **Comment:** I believe the economic crisis demands we look beyond car travel, and invest in long term transportation and energy solutions such as mass transit, light rail, and alternative fuel.
- ❖ **Comment:** The bridge is far too expensive to build in this recession climate.

33. Issue: Climate Crisis / Air Quality (See also Issue #29, Reduce SOV Traffic; Issue #28, Need Commuter Rail)

- ❖ **Comment:** I believe the climate crisis demands we look beyond car travel, and invest in long term transportation and energy solutions such as mass transit, light rail, and alternative fuel.

- ❖ **Comment:** Encouraging increased use of private transportation in the face of climate change and oppressive fuel prices is an irresponsible course of action. Thanks.

34. Issue: Preserve and Maintain Existing Infrastructure

- ❖ **Comment:** If we cannot maintain what we have there is no reason to build more.

35. Issue: Benefit Limited to Land Speculators (See also Issue 24, Sprawl)

- ❖ **Comment:** The Knik Arm Bridge will only benefit speculators who have purchased the land across in the Point MacKenzie area.
- ❖ **Comment:** The bridge will line the pockets of the developers.
- ❖ **Comment:** The only reason to pursue this bridge is to pander to special friends who own land across the Inlet.

36. Issue: Bridge would be Terrorist Target

- ❖ **Comment:** The Knik Arm Bridge will be a terrorist target.

37. Issue: Endangerment of Sea Life, Environment

- ❖ **Comment:** The Knik Arm Bridge will be harmful to the environment.
- ❖ **Comment:** A bridge would endanger sea life, and whales. This would be unacceptable, and there is virtually no way to avoid this. A bridge will be an environmental disaster.

38. Issue: Negative Impact on Anchorage Property Values

- ❖ **Comment:** The bridge would reduce property values in the Anchorage Bowl.

39. Issue: Financial Risk to State of Alaska, MOA

- ❖ **Comment:** Are the private partners seeking a revenue guarantee from the state if bridge tolls do not meet projections? The recently completed independent engineering estimate of the cost of the bridge stated that “without an equitable risk sharing agreement, the Project will not be economically feasible if proposals are received wherein all risks are passed on to the contractor,” implying that state/local financial participation is critical for the project to move forward.

- ❖ **Comment:** There is no way that the construction debt can be bonded without the backing of the full faith and credit of the Muni, and that could bankrupt us. Please vote “NO.”

Staff Response: The Anchorage Bowl 2007 revisions, Chapter 12, imposes a condition, page 9, that no additional state funds and no additional federal transportation funds beyond those currently authorized, as shown in Tables 12-2 and 12-4, would be used to finance the project, including both initial construction and future expansion costs...If state or federal funds are proposed to be added to the Knik Arm Crossing project and those funds are also needed to show financial constraint for other LRTP projects, and amendment would be required to reassess and demonstrate financial constraint for all projects in the LRTP.” In addition, Condition B, page 13, to including the KAC in the LRTP states that, “no local funds will be used for construction or maintenance of any element of this project.”

40. Issue: Under Planning for Needed Infrastructure

- ❖ **Comment:** The Knik Arm Bridge is far too problematic, risky and under planned to say the least. No concrete consideration has been given to infrastructure needs on either shore; schools, police, fire, EMS, sewer, water, landfill planning and funding are missing from the west shore, connections are hugely missing and non funded on the East shore. I say this in the face of a bridge benefitting me personally as my family owns recreational property in the Willow area that would be somewhat faster and more convenient to access.

III. OTHER LRTP COMMENTS (1 AGENCY)

41. Issue: Minority Population

- ❖ **Comment:** Throughout the LRTP there are statistical graphs that depict Eklutna as a “low-minority population.” We believe the conclusion is based on skewed statistics. We know of only one non-Native in the village area and that person is the spouse of a tribal member. We are concerned that such erroneous depictions actually eliminate Environmental Justice and other responsibilities. Here is one of our description about our population:

“Eklutna Population: The population of the Eklutna tribe totals 279. The majority of our tribal members live in the Anchorage area, including Eagle River, Birchwood, and Chugiak. Because the village site is land locked, only about 60 individuals reside within the village itself. That will fluctuate throughout the year due to subsistence and cultural activities. Both the tribal members and shareholders of Eklutna, Inc., the ANSCA Corporation, who may or may not be tribal members, call Eklutna “home” and consider it to be their village. Statisticians tend to include a nearby well-to-do subdivision, Thunderbird Heights, as part of Eklutna. None of our tribal members live there. The U.S. Census Bureau blends the boundary data due to rules intended to protect privacy rights.

We also have a dozen employees of which ten arrive at the village to work regularly. We hire part time and seasonal workers for various projects, such as environmental clean up, trespass management, and community activities. Many tribal members and guests come to the village for community and cultural events, group projects, educational fishing, potlatches, and so forth.

Tribes and Alaska Native/American Indian service providers are more in tune with the conditions of our populations. The ASD reduced and free lunch program statistics indicate that at least half of Alaska Natives within Anchorage are low income. Limiting analysis to Census districts, addresses, and generalizations, without including minority specific data such as service organizations’ reports, unfairly eliminates important information as well as advocacy for minority groups (groups or even communities within Anchorage need not have common address areas to qualify as a group or community). What are the specific statistics about minorities only, where do minority populations converge, seek services, work, pray, and recreate? How are minorities “really” impacted”. We know that other organizations such as CITC, SCF, ANMC, and the like have more resources and have collected very good statistics. We feel that the inclusion of data from minority service

providers would provide valuable information for evaluating impacts on minorities.

Staff Response:

FHWA Environmental Justice guidance for transportation planners is found at the following Web site:

<http://www.fhwa.dot.gov/environment/ejustice/facts/index.htm>, and directs transportation planners to the Census Data in making determinations for Environmental Justice. (EJ). The analysis methodology approach to consider areas having *a high concentration of low-income and minority populations* was the approach taken by consultants who prepared the LRTP for the Anchorage Bowl in 2025, and is consistent with the approach used by the MOA Public Transportation Department for similar analyses. The LRTP EJ analysis concluded that the recommendations in the 2025 LRTP did not have a disproportional impact *on areas with a high concentration of low-income and minority populations* [emphasis added]. Similar conclusions were drawn for Environmental Justice in the Chugiak-Eagle River 2027 LRTP, approved by the Policy Committee in 2007. Based on federal EJ guidance provided at the Web site mentioned above, this methodology approach may need to be revised in the future. Question 15 under “Questions and Answers on Environmental Justice and Title VI” on the federal guidance Web site provides the following guidance for making determinations:

15. How large must the minority or low-income population be to consider Environmental Justice?

Disproportionately high and adverse effects, not size, are the bases for Environmental Justice. A very small minority or low-income population in the project, study, or planning area does not eliminate the possibility of a disproportionately high and adverse effect on these populations. What is needed is to show the comparative effects on these populations in relation to either non-minority or higher income populations, as appropriate.

Some people wrongly suggest that if minority or low-income populations are small ("statistically insignificant"), this means there is no environmental justice consideration. While the minority or low-income population in an area may be small, this does not eliminate the possibility of a disproportionately high and adverse effect of a proposed action. Environmental Justice determinations are made based on **effects**, not population size. It is important to consider the **comparative impact** of an action among different population groups.

Staff recommends that the MOA convene a multi-disciplinary working group to 1) discuss the issue of determining disproportionate and adverse effects of recommendations in federally-funded plans and projects on minority and low-income populations, and 2) to provide written guidance for a common

methodology to be used. Such a working group should, at a minimum, include representatives from the Traffic Department, Public Transportation Department, Planning Department, the Mayor's office, and a professional demographer.

42. Issue: Public/Private Transportation Providers

- ❖ **Comment:** We believe that tribes and service organizations data should have been included in a participation plan regarding supplemental transportation [23 CFR 450.316, "Interested Parties, Participation, and Consultation."] Native Village of Eklutna provides transportation to members for medical appointments and health related activities due to limited access to public transportation. Usually tribal services are more cost effective as long as the number served remains small. There are also unmet tribal members needs for those who do live in bus service areas. At times, we purchase Municipal bus passes for persons who meet certain criteria. CITC, SCF, ANMC, not to mention ASD, are among those other organizations that provide transportation.

There is no municipal bus service to Eklutna village. Tribal sponsored transportation services are very limited. Our tribal members do use the bus service from Peters Creek. We therefore especially encourage continued bus service to Peters Creek. That is the closest stop to Eklutna.

Many tribal members cannot afford to acquire and maintain private transportation. This is compounded by increased fuel costs. Fuel prices affect the cost of travel, of course, and more significantly raises month-to-month essential utility bills. We know one tribal member whose electric bill runs twice as large as a few years ago; fuel charges account for over half of that bill. Reductions have not occurred as fuel prices dropped. Such economic conditions reduce monthly resources and further alienate tribal members from transportation options. When nearly all of Anchorage is described as a "low-minority population," any real impacts on minorities are swept under the rug. That in itself is unjust.

Staff Response: Staff would like to thank NVE for their comments, and for the clear explanation of how members receive transportation. The referenced CFR citation refers to development of the Public Participation Plan for AMATS, which was recently approved and adopted. We have been working

to refine the process of connecting with the Native Village of Eklutna. The MOA has a Memorandum of Agreement with NVE for transportation planning. During development of the Public Participation Plan, the consultant and project manager worked with and through Amy Dobmeier the Municipality's Rural Affairs Coordinator. Judging from your letter, we still need to work on refining the coordination/consultation process to yield better results for the Native Village of Eklutna. Let us continue to discuss together how to connect more proactively, and to have a better understanding of the proper protocol, and help us to receive updates for the designated staff at NVE for transportation planning consultations. Perhaps the Memorandum of Agreement could be amended to provide more specific guidance to staff and consultants so that we can provide a good level of consultation.

Regarding public participation, the Native Village of Eklutna should be included in outreach regarding transportation in the area in accordance with the federal guidelines (23 CFR 450.316). There are many ways of doing this and we are still learning. AMATS provides notice of upcoming meetings and planning activities using an email outreach program. Users subscribe to the email lists by providing their email address. When the AMATS public participation plan outreach was initiated, an extensive list was created, and Native Village of Eklutna was included on the list. However, from time to time there have been staff changes at NVE, and we need help in ensuring on a continuing basis that we have the correct e-mail addresses for staff. We look forward to working together to improve our process.

43. Issue: Pedestrian Accommodations

- ❖ **Comment:** Our ancestors walked regularly, sometimes all day, sometimes for several weeks. Our oral history tells stories of travels to and from the Kuskokwim, Kenai, Matanuska, Susitna, Tyonek, Gulkana and Copper Center. While there are more options in current times, many of our tribal members rely on the economical, tried and true methods of our culture. Unfortunately, modern design conflicts with minority tradition. Large intersections say “no pedestrians” while alternate routes add frustratingly cold miles in the dead of winter with no lighting, no safety measures, and plenty of moose. Modern development also adds video game mentality to driving. Walkers and bikers experience purposeful mud pond drenching by prankster drivers, sprint racing at large intersections, and dangerous snow

bank maneuvering where sidewalks should be. We did not see pedestrian accommodations addressed in the planning.

Staff Response: Pedestrian facilities are addressed in the Anchorage Bowl 2025 LRTP, with 2027 revisions, in Chapter 5, Status of the System Today, pages 38 through 40; in Chapter 8, Plan Recommendations, on pages 123 through 124; Chapter 9, Funding, on page 147; and in Chapter 10, Implementation Plan, pages 152 through 153. One of the recommendations of the LRTP (page 152) was to create an Anchorage Non-motorized Transportation Plan, focusing on paved and non-paved trails, sidewalks, ADA amenities, and bicycle lanes, and consisting of the following sub-plans: Anchorage Pedestrian Plan, Anchorage Bicycle Plan, and Areawide Trails Plan. The Anchorage Pedestrian Plan was completed in 2007 and is available at the following Web site:

http://www.muni.org/iceimages/transplan/PedestrianPlan_Web.pdf

A Public Review Draft of the Anchorage Bicycle Plan was completed in March, 2009, and is available at the following Web site, with plan update information: <http://www.muni.org/transplan/bicycle%20plan.cfm>

An update of the Anchorage Trails Plan is anticipated to begin in 2009, and plan update information will be available at the following Web site:

<http://www.muni.org/transplan/non-motorized.cfm>

The 2009 Public Review Draft amendment to the LRTP, Draft Chapter 13, also addresses pedestrian and bicycle facilities under the Safety planning factor discussion on pages 10-12.

44. Issue: Environmental Justice (See also Issue #45: Historic Areas and Environmental Mitigation)

- ❖ **Comment:** We are concerned that Environmental Justice issues are not adequately evaluated. The only item of study described under this subject appears to be Bus service.

It is our understanding that Environmental Justice covers many more topics, which have not been addressed in the LRTP. Here is a definition from the CFR 450 regulations [23 CFR 450.104, Definitions]:

“Environmental mitigation activities means strategies, policies, programs, actions, and activities that, over time, will serve to avoid, minimize, or compensate for (by replacing or providing substitute resources) the implementation of a long-range statewide transportation plan. The human and natural environment includes, for example, neighborhoods and communities, homes and businesses, cultural resources, parks and recreation areas, wetlands and water sources,

forested and other natural areas, agricultural areas, endangered and threatened species, and the ambient air. The environmental mitigation strategies and activities are intended to be regional in scope and may not necessarily address potential project-level impacts." (*Emphasis added.*)

We are concerned that while there is a large amount of GIS information on habitat and natural resources within the Anchorage Bowl, there is little information about the Chugiak-Eagle River (C-ER area; an area with a much more "rural character" than the Bowl. In Eklutna, it is common to see eagles, bears, moose, rabbit, fox, otter, salmon, magpies, wolves, squirrels, and historically used fauna; to name a few. (Please not that "village" or "Eklutna" does not always mean subdivisions. Tribal members frequently use these terms when referring to a much larger area based on where our elders and ancestors used land since childhood).

Staff Response:

A discussion of Environmental Justice is included in the Draft Public Review 2009 Amendment Chapter 13 on pages 7-8. This section explains that the Anchorage Bowl 2025 LRTP, Appendix B, Environmental Justice Evaluation, included an assessment of the plan recommendations for environmental justice. The assessment focused on *road and transit* recommendations, because "recommendations that have the greatest impact on low-income and minority populations are typically found in the road and public transportation sections of Chapter 8" (Appendix B, Environmental Justice Evaluation, page 2.)

The reference to environmental *mitigation* is a new LRTP requirement found in the federal regulations under plan content (23 CFR 450.322, (f) (7), discussion of environmental mitigation activities, and is closely related to another new requirement (g) for expanded environmental consultation. The LRTP discussion is to include types of potential environmental mitigation activities that may have the greatest potential to restore and maintain the environmental functions affected by the metropolitan transportation plan. The discussion is meant to focus on policies, programs, or strategies, rather than at the project-specific level, and is to be developed in consultation with Federal, State, and Tribal land management, wildlife, and regulatory agencies.

Staff has forwarded comments #44 and #45 to the MOA Planning Department staff responsible for developing the MOA GIS Resource Maps for further discussion. Transportation Planning Staff will provide follow up during the public comment period to obtain input for determining how the consultation and environmental mitigation activities section may be strengthened.

45. Issue: Historic Areas and Environmental Mitigation

- ❖ **Comment:** There are historically or culturally important lands in both the CER area and Anchorage Bowl, as far as the tribe is concerned. Traditional knowledge evidences the presence of specific sites and areas important to Eklutna and other Dena'ina, including wetlands, natural areas, habitats, cultural resources, and other categories under the meaning of Environmental mitigation. Those topics do not appear to be addressed in the LRTP documents. If they are covered elsewhere, we are interested in reviewing that information.

We have a good working relationship through HDR on existing Department of Transportation and Federal Highway projects, including the Highway to Highway (Seward to Glenn Highway), and Knik Arm Crossing 106 consultations and mall MOA's. We informed them of immense displeasure with the SHPO office, having seemingly racially discriminating site recognitions, and asked for assistance in working with the SHPO. As a result, this is now an actual component in our new cultural MOA's and we look forward to resolving Dena'ina site issues with that office. We mention this here because the tribe is aware of quite a few places important to our history, culture, and sense of identity even though they may not be listed with the state. In fact, through other grants and contracts our efforts identified quite a few new locations that had not been listed. For those reasons, it is important that any cultural review process include a direct contact with the tribe, rather than a simple record search. Through prior mitigation process we have negotiated for a replacement fish camp, tribally approved historical or cultural site signage, and cultural research/data gathering contracts. This year our tribe established a Cultural/Historical restricted fund in order to develop publications.

Staff Response: For this LRTP update, staff conducted outreach to a broad list of federal, state, tribal and local agencies in an effort to engage them in a discussion of suggested mitigation activities. Draft language was provided to the agencies for review and comment. Several agencies provided additional language that was requested to be included in the discussion on environmental mitigation activities. In response to an earlier request, consultation with Native Village of Eklutna is specifically addressed on page 17 of Draft Chapter 13. Project managers are notified that they "should

consult with Native Village of Eklutna Land and Environment Department to determine all potential impacts to cultural resources in a project area, and address potential mitigation measures in project documentation.”

Transportation Planning Staff will provide follow up during the public comment period to obtain input for determining how the consultation and environmental mitigation activities section may be strengthened.

NOTE: Comments were provided for the following issues that are more directly related to the Chugiak-Eagle River LRTP. These comments are not included here, but will be responded to through staff follow up with the agency providing the comments:

46. Issue: Eklutna River/Thunderbird Bridges

47. Issue: Peters Creek Bridge, Other Chugach – Eagle River Road Improvements, and Trails

IV. COPIES OF ORIGINAL COMMENTS RECEIVED THROUGH MAY 8, 2009 (ATTACHED)