
TURNAGAIN COMMUNITY COUNCIL

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

TO: Mr. Tim Coons, Lake Hood Seaplane Base Manager
Ted Stevens International Airport
Alaska Department of Transportation and Public Facilities (DOT&PF)
FROM: Turnagain Community Council
DATE: December 20, 2018
RE: **ADA-32171 Lease Application & Development Proposal by TLC Properties, LLC, for Property at Southwest Corner of Lake Hood Drive and Helio Place**

Sent via email

Note: Due to comment deadline constraints, the below comments are being submitted by the Turnagain Community Council Land Use Committee; they will be submitted for approval at the Turnagain Community Council January 10, 2019, general membership meeting.

Dear Mr. Coons (Tim):

Thank you for the opportunity for the Turnagain Community Council (TCC) to provide comments on the proposed application by TLC Properties, LLC (TLC Properties) for a 50-year lease on Airport property located at the southwest corner of Lake Hood Drive and Helio Place. This parcel of land consisting of Turnagain Bog wetlands and associated wetlands is located generally within the Lake Hood Seaplane Base (Lake Hood).

A. Turnagain Community Council's Long-Standing Turnagain Bog Position Statement

Over the years, a large portion of Turnagain Bog has been filled and developed with airport-related facilities. Because of this, TCC has long advocated for preservation — and buffer designation — of the remaining areas of Turnagain Bog, due to its close proximity to the Turnagain neighborhood and the important buffering and ecological functions these wetlands provide, including water quality filtration, hydrology, aesthetics, ground noise buffering, wildlife habitat and emergency aircraft safety landing area.

TCC also reiterates our long-standing opposition to additional airport-related development in Turnagain Bog, which would compromise the above important functions — and generally replace those functions with potentially detrimental development impacts to our neighborhood.

While acknowledging the development of T-hangers would provide desired GA amenities at Lake Hood, TCC respectfully requests that the negative impacts to our neighborhood of development in this area be considered when the Airport reviews and considers approval of the TLC Properties lease application.

B. TCC's Review of the Airport Field Maintenance Storage Yard Expansion Environmental Assessment July 2017 & the TLC Properties Application

Just as TCC reviewed and provided input during a meeting with DOT&PF officials in December 2017 on the Draft Environmental Assessment July 2017 (EA) for an Airport Field Maintenance

Turnagain Community Council

Storage Yard Expansion project in Turnagain Bog — the TCC Land Use Committee has reviewed the proposed TLC Properties application to lease approximately 850,000 square feet of this exact same area of Turnagain Bog, for the purpose of developing a large general aviation (GA) complex of T-hangers, aircraft tie-down spaces and associated facilities. Based on these reviews, TCC provides the following concerns, recommendations and questions.

C. Fill & Development Impact Concerns:

TCC has identified several specific impact concerns that we request the Airport — and/or their leaseholder, if the Airport approves a lease with TLC Properties of this parcel — address as conditions of development in this area of Turnagain Bog:

1. **Aircraft/Vehicle-related ground noise** originating from the use/operations of the proposed leased use — as well as noise generated during the development of the parcel.
2. **Negative impacts related to development of this property as identified in the 2017 EA for the Airport’s proposed maintenance storage yard expansion in Turnagain Bog.** One of the most significant impacts from the Airport’s previous development proposal, which included fill and leveling of most of the property, was the need to manage stormwater runoff, likely containing the common effluents associated with aircraft storage and maintenance, and addressing wetland waterflow and drainage issues. Negative impacts from fill and development of the remaining areas of Turnagain Bog wetlands and associated uplands are not isolated and affect the waterbodies connected to it in the Turnagain community — specifically, water quality and hydrology of Hood Creek, Jones Lake, and Cook Inlet. **Additional negative impacts of fill & development of Turnagain Bog** include removal of wildlife habitat, and clearing/removal of noise buffering/aesthetic and other environmental attributes of the trees and other vegetation on this parcel.
3. **Cumulative impacts of Turnagain Bog wetland fill and development.** The Anchorage Wetlands Management Plan states, “Cumulative impacts shall be considered for future fill actions, as the [Turnagain] bog has lost approximately 200 acres since 1996.”
4. **Safety and traffic impacts associated with proposed TLC Properties development/operations**, including two proposed aircraft crossings on public roads (Lake Hood Dr. & Helio Dr.); increase in aircraft and vehicle traffic during peak (spring/summer/early fall) usage of this leased property; and likely increased impacts to other users of the public road rights-of-way: aircraft owners and personnel, tourism buses and other sightseeing visitors, bicyclists and pedestrians.

D. TCC Recommended Mitigation Actions, if Lease Application is Approved:

While TCC has had limited time to prepare comments on the TLC Properties lease application — and does not have all the information we need to provide a thorough evaluation of the proposed development (see E. below) — so far, we have identified the following specific mitigation recommendations for the Airport and the proposed leaseholder to consider, in order to address the above identified fill and development impact concerns:

1. **Preserve the existing stands of mature trees and other vegetation in the eastern and southern portions and along the perimeter of the parcel.** Natural features within the proposed lease area include large stands of mature trees in the western and southern portions (as well as some trees on the eastern side along Helio Pl.). This large, treed area

currently provides an essential sound mitigation and aesthetic buffer between the West Turnagain residential area and the post office complex to the west as well as jet aircraft ground noise generated in the western areas of the International Airport airfield/North Airpark area. Retention of this treed area would also be beneficial to the hydrology of the wetlands in this area. If this treed buffer was removed and replaced with additional high impact aviation noise-generating development and operations closer to our residential area — as proposed by TLC Properties — the negative effects from additional noise traveling toward the West Turnagain neighborhood would be substantial. Retention of a treed buffer is a proposal that was specifically requested by the TCC Board members who met with DOT&PF officials in December 2017 to discuss the proposed Airport field maintenance storage yard expansion — and they expressed interest in this impact mitigation proposal.

TCC feels the most preferable way to ensure protection of this treed area is to remove this acreage from consideration of any Airport approved lease application, including the TLC Properties development proposal.

2. **Do not lease, or allow development of, the entire property for this development.** The applicant is proposing to lease and develop the entire 850,000 sq. ft. of Turnagain Bog in this parcel, with their conceptual drawing submitted in the application depicting a theoretical maximum number of structures. But the application also indicates that this development would be phased. By retaining the specific treed portion of the property identified in #1, the existing vegetation serving as a noise buffer can be preserved, but still allow some phases of the development to occur. Additionally, the remaining vegetation and unpaved ground can continue supporting drainage and groundwater movement, potentially reducing the need for additional manmade mitigation.
3. **Phase the development of the T-hanger complex project to retain the vegetated section identified above,** ideally permanently, (see #1) but at least as long as possible, until the last portion of the property is developed. If initial phases of the T-hanger complex are developed outside of this identified treed area — and demand for full development does not materialize, then the treed area could remain intact.
4. **Eliminate the development of 23 tie-down spaces from the development proposal.** During the Lake Hood Master Plan Update stakeholder advisory group meetings, pilots and others representing GA aviation interests repeatedly stated that development of additional tie-down spaces at Lake Hood were a low priority for them, mainly because Merrill Field has plenty of tie-down space availability. (A higher priority was to add additional floatplane slips.) By eliminating the development of tie-down spaces from the proposal, the TLC Properties overall development footprint would be reduced, allowing a smaller portion of the parcel to be leased to the applicant. This would also reduce noise and wetland fill/development-associated impacts. (Please note: this is also discussed included in section E. 4. below.)
5. **Orient the T-hangers and any other buildings, and continuous spaces between buildings, to block rather than channel or amplify aircraft noises from the west.** The orientation of the buildings in the application shows a potential “tunnel” for sound waves toward the neighborhood. Building ‘faces’ and avoidance of long corridors between buildings could help provide a manmade noise buffer in the same area, and have a further beneficial effect to the existing trees.

6. **Require applicant to plant additional vegetation, such as evergreen trees, along the northern and eastern perimeters of the property (assuming the existing trees are preserved on the west and south sides), to enhance year-round noise and aesthetic buffering from noise created by uses on the developed lease area as well as ground noise generated farther west. This landscaping requirement is another proposal that was specifically requested by the TCC Board members who met with DOT&PF officials December 2017 — and they expressed interest in this mitigation strategy.** (Please note: evergreen landscaping was requested by TCC when the snow storage area was developed across Lake Hood Dr. to the north several years ago. While a few trees have not fared well over time, overall this evergreen tree planting has provided beneficial noise and aesthetic buffering along Lake Hood Dr.)

E. TCC Questions and Request for More Information:

Base on the TCC Land Use Committee’s review and discussion of the TLC Properties lease application, the committee identified several questions regarding the application/development proposal:

1. How much additional aircraft-related noise would this development create, and at what times of day? Based on current usage patterns, TCC anticipates more noise, particularly in the summer, as more airplanes would be taxiing and operating in the area. Does TLC Properties anticipate the total number of Lake Hood GA aircraft to increase as a result of its T-hanger development — or do they see that most of their business would be from current Lake Hood tenants renting the T-hangers for storage during the winter months?
2. Given that this is a private development on Airport land, what precedent is there for requiring a private developer to mitigate noise and other impacts identified in this letter from their wetland fill and development on the surrounding neighborhood? Is the applicant’s willingness/ability to appropriately mitigate impacts being considered by the Airport as a condition in a potential lease agreement?
3. There is a great deal of concern about the two proposed road crossings (Lake Hood Dr. and Helio Pl.) to access the lease application parcel, and potential use conflicts between different groups who use these roads: airport and other personnel, pilots, maintenance crews, tourists, tour company buses, bicyclists, joggers, people walking dogs, and other pedestrians. While many of these are non-GA uses, the Lake Hood Seaplane Base Master Plan stated in 2006, and again in 2016 Lake Hood Master Plan Update, that public recreational use of this area is permitted in the Lake Hood area — and Lake Hood will continue to resolve user conflicts in this GA area of the Airport.
 - a. Has the Airport considered modifying the proposed development, so that it would be limited to one road crossing, in order to reduce conflict between vehicle/nonmotorized use and GA aircraft that would be taxiing between this T-hanger complex facility and the gravel strip runway (or other areas at Lake Hood)?
 - b. Can you please provide TCC any comments/concerns provided by FAA to the Airport on these public road crossings proposals, in order for TCC to appropriately assess just how big of a public safety concern the proposed development would pose? Would approval of these public road crossings by FAA be a lease approval requirement?

- c. How will any increased safety impacts be avoided between users of the T-hanger complex and other users on the roads? What roadway feature/s would be installed to help reduce user conflicts and how would those be determined? — and what party would be responsible to pay for/implement these aircraft and/or other roadway user traffic management features?
4. What, if any, concerns does the Airport have about the feasibility of this TLC Properties proposed development project in meeting GA demands? The Lake Hood Seaplane Base Master Plan documented in 2016 that airport users described the primary demand in the region being more floatplane slips, not GA parking. In addition, there is available parking at Merrill Field to meet this potential demand. Even if the development is phased as proposed, to what extent does the property need to be developed to meet this anticipated demand?
5. The Airport proposed a field maintenance storage yard expansion development for this area of Turnagain Bog in 2017. Most of the acreage was proposed to be paved, with mitigation provided by some stormwater and drainage features to collect and treat runoff through plant and swell filtration. An environmental assessment was completed for this project in November 2017.
 - a. Has the lease applicant been provided a copy of the EA?
 - b. How will the relevant negative impacts of development of Turnagain Bog at this parcel identified in the July 2017 EA be mitigated by the lease applicant and/or the Airport?
 - c. To the extent that the new proposed project would have aircraft parked onsite, with considerable more seasonal traffic generated to and from the site, it may have more or different impacts than the original proposed use. Will a new EA be required before a Corps wetland fill permit could be issued, to appropriately address the impact differences generated by this new development proposal? If not, how does the applicant propose to mitigate the most likely additional impacts, such as fuel leakage and additional aircraft-generated ground noise?
 - d. The EA references the need to relocated fire hydrates — would the applicant be required to do this, and cover the cost of the relocation as well (if needed)?
 - e. John Johansen stated at our TCC December 6, 2018, meeting that the applicant would not be able to use the Corps wetland fill permit issued to the Airport for this parcel — and that the applicant cannot use Klatt Bog mitigation credits. Has the applicant indicated to the Airport what mitigation they anticipate the Corps will require under a new wetland fill permit?
 - f. Included in the July 2017 EA is a letter dated January 5, 2017, from DOT&PF that solicited comments and information on the proposed Airport field maintenance storage yard expansion, which was proposed to be located in same area TLC Properties has now submitted a lease application. The letter states under Purpose and Need, “Expanding the AFM Storage Yard is integral to continued growth and reliable maintenance at the AIA facility.” If the Airport decides to approve TLC Properties 50-year lease for this same parcel, 1) has the “integral” need for an expanded AFM Storage Yard expansion changed since January 2017? If so, please explain; or 2) if the storage yard expansion is still an “integral” need for the Airport, what locations is the Airport now considering for development of the storage maintenance yard expansion? Are any areas for this expansion being considered in

Turnagain Community Council

other areas of Turnagain Bog — potentially located closer to the Turnagain neighborhood than the originally proposed location last year?

Due to the complexities of the TLC Properties lease application and proposed development as well as the numerous items identified in this comment letter:

- ⇒ TCC requests a meeting at the earliest convenient time (after the first of the New Year), with appropriate Airport officials and the applicant, TLC Properties — before the Airport makes a decision on the lease application submittal — to learn more about the project, receive answers to the above questions, and to discuss our community council's stated concerns and proposed mitigation recommendations directly.
- ⇒ TCC also feels an on-site visit to discuss size and location of tree buffer retention would be very productive for all parties and requests this also take place before the Airport's decision.
- ⇒ TCC also respectfully requests that we receive notification when the Airport has made a determination on this lease application.

Turnagain Community Council looks forward to a timely response to the above comments and requests — and the opportunity to collaborate with the Airport and TLC Properties, if this proposed lease proceeds to the next step.

Sincerely,
Cathy L. Gleason
Turnagain Community Council President