

Correspondence



RABBIT CREEK COMMUNITY COUNCIL (RCCC) A Forum for Respectful Communication & Community Relations



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Brian Elliott, Regional Environmental Manager
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June 5, 2021

Dear Mr. Elliott:

The Rabbit Creek Community Council (RCCC) appreciates this opportunity to provide comments on the expanded scoping for the project formerly identified as Windy Corner MP 105 – 107, and now called MP 105- 109.5, Windy Corner to Rainbow Point. We are pleased that project scoping has been expanded to extend the project further north to Rainbow Point, evaluate the feasibility of obtaining materials from outside Chugach State Park, and will consider a separated multi-use pathway connecting the popular Windy Corner and Rainbow trailheads.

The RCCC borders Chugach State Park; many of our residents use the Turnagain Arm trail as well as the Seward Highway. We closely follow road projects and issues involving access to Chugach State Park in South Anchorage. At a noticed public meeting on May 13, 2021, the RCCC voted to submit comments regarding this expanded scoping (18 yeas, 2 nays, 4 abstained). First, we are resubmitting the comments made in our August 14, 2020 letter to the Alaska Department of Transportation & Public Facilities (ADOTPF) requesting several points of reconsideration and design revision (enclosed). Additionally, the RCCC voted to submit additional comments to take advantage of the expanded project scoping. By submitting comments now, during agency scoping, we hope to ensure a broad scope for this project. We understand there will be, and anticipate participating in, future public comment periods.

We believe these additional points discussed at our May 13, 2021 meeting support and expand on the extended scoping you have undertaken for this project:

1. The original Windy Corner project is a piecemeal approach to safety and access that is not cost-effective and may not be a priority compared to other needs along the Seward Highway corridor.

This expanded project north past Rainbow Point is more comprehensive. However, the eastern project terminus stops just 200 yards short of Falls Creek pullout, which draws increasing numbers of Chugach State Park visitors and is a turning hazard. This expanded project should include Falls Creek pullout, beginning at about MP 104.75.

2. The original project created rock quarries with Chugach State Park (Park) that are not allowed under Chugach State Park authorizing statutes, and that have greater adverse impacts than alternative materials sources.

We repeat the request to re-evaluate multiple materials sources other than Chugach State

Park; to put a monetary price on the Park materials; and also, to put a price on the loss in value of Park land and the future maintenance and management costs to Chugach State Park of abandoned quarries. The "free" cost of the Park quarries is deceptive. The lost value to the Park, and the disruption of quarrying on the Rainbow neighborhood and to traffic must be quantified. In addition, materials cost should not be the overriding factor on a project of this magnitude.

The expanded project should rule out quarrying. Quarrying for export outside of the Park (even to the adjoining highway) is not allowed under statute and sets a dangerous precedent. Evaluation of quarrying materials within the road right-of-way is worthy but inadequate.

3. The original design lacks both a multi-use separated pathway and a sufficient connection to the existing, adjacent Turnagain Arm Trail.

Failure to include the separated pathway would exacerbate the danger to cyclists in this stretch of roadway, because the new project will greatly increase turning and passing movements.

A separated multi-use pathway from Rainbow Point to Windy Corner would implement the long-standing intent of municipal plans and the Chugach State Park plan to extend a multi-use path from Potter Marsh to Girdwood. Therefore, the path should extend the entire length of this project, to bring us closer to those intentions.

The Turnagain Arm hiking trail that winds along the hillside will experience a surge in use when pullouts and trailheads are upgraded. The project should include mitigation funding for sustainable trails within the Park, with features that will deter nuisance behavior such as harassment of the Dall sheep.

4. The original project does not include safe turning lanes and may increase speeding-related crashes.

We re-iterate our concern that turning lanes need to be provided for both north and southbound traffic. We also have concerns about the design speed. We advocate features to ensure that this stretch of highway is not a high-speed passing zone with speeds that will be incompatible with safe turning. The distraction of sheep on the adjacent cliffs is not solved by building a pullout. If safety is truly the objective, this should be a safety zone, not a high-speed zone.

5. The original design does not fully account for impacts to wildlife, especially Dall sheep and beluga whales.

The new scoping does not address these issues. We re-iterate our earlier concerns. Specific to Dall sheep, wildlife biologists should consider how sheep movements will be affected, in terms of habitat loss, traffic impacts, and humans on foot. Beluga whale use of the natural shoreline merits further scrutiny.

6. The original design creates oversized and unfunded management costs for Chugach State Park. The quarries are unusable for recreation, and will attract nuisance behavior. The Windy Corner pull-out has an industrial-scale parking lot and a highway toilet stop that are not funded in the State Park budget. The adjoining Chugach State Park trails will experience

a surge in foot traffic. We recommend the following actions:

- *ADOTPF works with Chugach State Park staff, the Chugach State Park Citizen Advisory Board, and residents of Rainbow to determine the appropriate scale of parking, as well as upgrades to the adjoining trails to protect Park resources and Rainbow properties from highway and visitor impacts.*
- *The new scoping must calculate future maintenance and law enforcement costs for the abandoned quarries and the highway pull-out.*
- *There should be a determination of whether current parking passes can be used or Park visitor fees can be collected: if not, maintenance becomes an unfunded burden for Chugach State Park.*
- *Since the proposed Windy Corner pull-out will serve as a de facto highway rest stop, ADOTPF and Alaska Department of Natural Resources should negotiate future management and maintenance responsibilities and funding. Toilet and trash service for motorists should not become an unfunded mandate for Chugach State Park.*

We appreciate your attention to these comments and recommendations and look forward to continuing our participation in this important community and State project.

Sincerely,



Ann Rappoport, Co-Chair
Rabbit Creek Community Council



Carl Johnson, Co-Chair
Rabbit Creek Community Council

Enclosure

cc: Representative James Kaufman
Senator Roger Holland
John Weddleton, Assembly
Suzanne LaFrance, Assembly
Superintendent Ben Corwin, Chugach State Park
Chair Ryan Yelle, Chugach State Park Citizen Advisory Board
Bike Anchorage
Piper Machamer, Chair, Turnagain Arm Community Council