

**Turnagain Community Council
c/o President Cathy L. Gleason
4211 Bridle Circle, Anchorage, AK 99517**

August 31, 2012

Sent via Email

Ms. Karen Keesecker
Municipality of Anchorage
Community Development Department
Planning Division
P.O. Box 196650
Anchorage, AK 99519-6650

**RE: Case No. 2012-029
Anchorage Wetlands Management Plan Update Public Hearing Draft**

Dear Ms. Keesecker and Planning Staff:

Thank you for the opportunity to provide comments on the update to the Anchorage Wetlands Management Plan Public Hearing Draft (AWMP Draft). Turnagain Community Council (TCC) has consistently supported responsible wetland management in our area, especially since we have one of the highest value wetlands — Turnagain Bog — within our boundaries. TCC appreciates the time you and Thede Tobish have spent working with us to come up with input to the AWMP draft.

Following are TCC's comments/recommendations (in red) for the AWMP Draft. Specifically, this is our input to what you provided us last month in your response to our questions/recommendations during our July 18, 2012, meeting. *Please don't hesitate to contact me if you have any questions or need clarification:*

Sincerely,

Cathy L. Gleason
Turnagain Community Council President

MOA – Long-Range Planning Section Response to
Turnagain Arm [sic] Community Council Preliminary Comments: AWMP 2012
August 2, 2012

Page 12

Suggested including AWAM as an appendix in the updated plan as it was included in 1996 plan:

Due to high printing costs, we had hoped to save money by providing an online link instead of including the 58 page AWAM; however, we will consult with those who use the AWAM and solicit their opinion. The AWAM information is still pertinent in terms of debit/credit calculations for mitigation. If others also feel the document is necessary within the plan, we will strive to include it. If it simply becomes cost prohibitive, we may still need to use the online link instead.

TCC Response: Providing a link to the Anchorage Wetlands Assessment Methodology document sounds reasonable, due to it's 58-page size.

Page 28

Cite Federal Guidelines for aircraft safety in the appendix.

Do Federal Guidelines allow for onsite mitigation for buffering between airport development and adjacent compatible uses?

We are researching mitigation requirements for wetland permits within airport boundaries—whether the Corps can require buffers in airports from neighborhoods, or if FAA requirements ultimately trump a COE permit requirement, i.e. FAA regulations do not allow airports to use airport land as buffer. Generally, the Corps could invoke a buffer from permitted development primarily to shield the remaining undeveloped wetland from the impacts of that development, i.e. trash, noise, human presence, to maintain the wetland's habitat values. This may be in conflict with FAA guidelines for safety.

TCC Response: TCC would like to be provided with any information you obtain from the Corps of Engineers and/or FAA regarding onsite mitigation or wetland buffer designations on airport property. TCC still requests that the AWMP cite specific reference and an online link and/or actual federal guidelines for aircraft safety in the Appendix.

TCC requests the following below language replace the second sentence in the first full graph on page 28 of the AWMP Draft (your suggestions in blue/TCC's amendments in red):

“For permits requiring mitigation within Anchorage International Airport properties, when not in conflict with FAA regulations/guidelines and applicable airport safety standards, and where feasible, a buffer shall be provided in wetlands permitted for development when abutting residential areas. The remaining undeveloped wetlands shall be shielded from permitted development to maintain social, habitat and hydrology/water quality function values.”

Page 50

Turnagain Bog Management Strategies (Site # 26A,B):

Retain relevant language from 1996 plan. Reference West Anchorage District Plan and AO 2000-151(S-2), including specific language from both documents and include AO in appendix.

Irrelevant language was removed from the 1996 plan. We can add reference to the West Anchorage District Plan and the A.O. as online links (again in the interest of saving copying costs).

TCC Response:

- Turnagain Bog section should include specific directive language from AO 2000-151 (S-2) regarding a joint master plan between the airport and the Municipality in first graph of Table 4.1, as opposed to just referring to the 'lands not permitted' area designated in the ordinance.
- While TCC would prefer that AO 2000-151 (S-2) be included in the AWMP Appendix, providing a link to the ordinance would be acceptable.
- Request below language for **first graph** (your suggestions in blue/TCC's amendments in red):

"Fill permit actions shall be consistent with the land use designations and the alternatives analysis contained in the *Anchorage International Airport (ANC) Master Plan*, the *West Anchorage District Plan (July, 2012)* and the directive in AO 2000-151 (S-2) that any future development of the natural portions designated as 'lands not permitted' shall occur only after a master plan for that area is prepared jointly by ANC and the MOA and approved by the Anchorage Assembly after a public hearing. **provide online link for ordinance. Priority shall be given to airport location-dependent enterprises. Development planning and permitting shall fully consider other Municipal planning documents such as trails, roads, and drainage plans for the airport area. Cumulative impacts shall be considered for future fill actions, as the bog has lost approximately 200 acres since 1996.

Reflect cumulative impacts, acreages from previous plans to indicate historic losses in bog, emphasizing retention of core bog area. See sample language above.

Use 'shall' instead of 'should' for enforceable language.

See sample language above; we will incorporate 'shall' as much as possible.

Clarify AWAM scores were not updated since '96 AWMP; sites not reevaluated for 2012.

This can be more easily clarified by adding a line at the beginning of the management strategy tables, i.e. “the only new AWAM scores listed are former ‘U’ classified sites. The remaining scores listed are from the 1996 plan”.

TCC Response: Providing a general statement regarding function value scores at the beginning of Table 4.1 is a good solution to clarify scores for all wetlands in the updated plan.

Consider increasing buffer distance between permitted fill in “C” wetlands and “A” and “B” wetlands from 25-ft and 15-ft to an increase buffer distance. At least use same language as per pg 33, using ‘shall’ instead of ‘should’. Include that compensatory mitigation (In-lieu-fees) is required for General Permits. (Pages 3-4 of TCC preliminary comments)

We will consult with the Corps of Engineers as it is under their authority that the buffer distance was set in the General Permit (GP, issued 2010). If it requires a public notice to change the General Permit language, this request may need to wait for consideration until the GP is reissued in 2015. For the AWMP update, we may be able to change the wording from ‘should’ to ‘shall’ and use the same language as per page 33. We could also cite the AWMP update per page 32, Chapter 4, section C. Definitions, where a ‘customized setback’ could be invoked by regulators. We can include that ILF fees are required for GPs under Ch. 3. I. B. Regional General Permits.

Mitigation language as per 1996 AWMP should be included.

Some of the ’96 text was omitted as it was no longer appropriate, i.e. “AIA Strategic Mitigation Plan”. The Corps of Engineers dictates mitigation per the Federal Mitigation Rule, which could be cited and/or provided with an online link along with AO 2000-151(S-2). Chapter 6 of the plan also covers mitigation overall.

TCC Response:

- Until you are provided with information from the Corps of Engineers regarding a potential increase buffer distances between “C” wetlands and “A” and “B” wetlands, TCC requests in the Turnagain Bog section that “should” be changed to “shall” and that “**minimum**” be inserted in front of all set back distances.
- Under “C” sites, retain the specific language from the 1996 AWMP with regard to the requirement of an impervious barrier.
- Request below language for **second and third graphs** for the Turnagain Bog section in Table 4.1 (draft language in black/your suggestions in blue/TCC’s amendments in red):

“C” sites: **General Permit applicable.** GP Site Restrictions and Design Criteria **that shall be adhered to:** *Construction timing window; Wetland Delineation; Identify surface*

water features; *Best Management Practices* for local flooding; dewatering of adjacent wetlands and storm water controls required. Maintain a 65-ft setback from all waterbodies. *A 65-foot transitional buffer shall be maintained between fill authorized in the GPs and adjacent "A" wetland. An impervious barrier shall be placed at the margins of any fill authorized by these GPs, to the bottom of the peat layer, or to a minimum of one foot below the bottom of gravel fill, to preclude groundwater outmigration from adjacent wetland. Maintain a minimum 25-ft buffer from fill authorized by the GP and "A" wetlands, a minimum 15-ft buffer from "B" wetlands.*

"A" and "B" sites: Projects that address airport safety issues and neighborhood conflicts (e.g., noise impacts, clear-zone requirements), including minor road, trail, utility lines, should be permitted. *The main Turnagain Bog core contains patterned ground wetlands and shall be maintained and buffered to the maximum extent possible. The wetland provides high value functions for groundwater recharge, water quality, stormwater attenuation, aesthetic and noise buffering and habitat.*

Page 51

Postmark Bog (site #26D)

Note cumulative impacts to the bog over time; cite acreage lost.

Note that AWAM scores are same as '96 plan; have not been updated.

Include previous statements about habitat values per '96 plan.

Similar language to units #26A and B citing cumulative impacts could be incorporated. Realistically, if the site was reassessed using the AWAM, the bog may generate lower scores due to it's now smaller size. Emphasis on the sites habitat values may be difficult to justify given the acreage losses. Although still somewhat valuable for bird use, given its close proximity to airport runways, it's tricky to say it should be preserved for habitat. We can still point out what's happening there now in terms of the resource so that when the time comes, proper mitigation could be invoked for the loss. We all seemed to agree that this bog would be harder to defend compared to Turnagain Bog.

TCC Response:

- **Concur with above.**
- **TCC requests that the following language be added after the first sentence of the section:**

"Cumulative impacts shall be considered for future fill actions, as the bog has lost approximately 27 acres (approximately 1/3 of its size) since 1996."

Lake Spenard (site #26E)

AWAM scores not assessed, yet designated as "A"?

Lake Spenard area wetlands were not included until the 1996 AWMP. It was assumed the site had "A" designated values due to it's proximity to the lake. The fact that it was

park land made the “A” designation more justified. We are able to assess this site per AWAM and will consider applying the AWAM to other sites not previously assessed as time allows.

TCC Response: Concur with above.